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

Date: Monday 11 to Thursday 14 March and
Monday 18 to Thursday 21 March 2024
Time: 9.30am
Meeting Room: Stevenson room
Venue: The Franklin Centre, 12 Massey Avenue,
Pukekohe, Auckland

HEARING REPORT – VOLUME THREE

8 NOTICES OF REQUIREMENTS FOR AUCKLAND COUNCIL AND 1 NOTICE OF REQUIREMENT FOR WAIKATO DISTRICT COUNCIL FOR THE PUKEKOHE TRANSPORT NETWORK

NOR 2 & NOR 8 TE TUPU NGĀTAHI – SUPPORTING GROWTH ALLIANCE

COMMISSIONERS

Chairperson

Dave Serjeant

Commissioners

Nigel Mark-Brown

Basil Morrison

Bevan Donovan

**KAITOHUTOHU WHAKAWĀTANGA HEARINGS
ADVISOR**

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

WHAT HAPPENS AT A HEARING

Te Reo Māori and Sign Language Interpretation

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

Hearing Schedule

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

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

Cross Examination

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

The Hearing Procedure

The usual procedure for a hearing is:

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

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

**EIGHT NOTIFIED NOTICES OF REQUIREMENTS TO THE AUCKLAND COUNCIL
UNITARY PLAN AND ONE NOTIFIED NOTICE OF REQUIREMENT TO THE WAIKATO
DISTRICT PLAN BY TE TUPU NGĀTAHI – SUPPORTING GROWTH ALLIANCE**

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Karen Bell, Planner

Reporting on NOR 2 – Pukekohe Link and NOR 8 Mill Road and Pukekohe East Road Upgrade. These are part of eight Notice of Requirements (Auckland Council) and one Notice of Requirement (Waikato District Council) for the Pukekohe Transport Network.

REQUIRING AUTHORITY: TE TUPU NGĀTAHI – SUPPORTING GROWTH ALLIANCE

NOR1 - DRURY WEST ARTERIAL

Notice of requirement lodged by Auckland Transport for a designation for a new transport corridor with active mode facilities in Drury West, extending south from the intersection of State Highway 22 and Jesmond Road to the edge of the Future Urban Zone near Runciman Road, Drury.

NOR2 – PUKEKOHE LINK

Notice of requirement lodged by Waka Kotahi NZ Transport Agency for a new state highway including a shared path from Great South Road, Drury in the northeast, connecting State Highway 22 in the west, and the area in the vicinity of Sim Road/Cape Hill Road, Pukekohe in the south.

NOR3 – PAERATA CONNECTIONS

Notice of requirement lodged by Auckland Transport for two new transport corridors including active mode facilities. One between the two extents of Sim Road, Paerata across the North Island Main Trunk Rail Line. The second between Paerata Rail Station and Sim Road, Paerata.

NOR4 – PUKEKOHE NORTH-EAST ARTERIAL

Notice of requirement lodged by Auckland Transport for a new transport corridor including active mode facilities between State Highway 22, Paerata on the north west and Pukekohe East Road, Pukekohe in the south east.

NOR5 – PUKEKOHE SOUTH-EAST ARTERIAL

Notice of requirement lodged by Auckland Transport to upgrade part of Pukekohe East Road and Golding Road, and a new connection from Golding Road to Svendsen Road, Pukekohe across Station Road and the North Island Main Trunk Rail Line - including active mode facilities.

NOR6 – PUKEKOHE SOUTH-WEST UPGRADE

Notice of requirement lodged by Auckland Transport to upgrade of specific intersections and the regrade of specific driveways on Nelson Street, Ward Street, West Street and Helvetia Road for active mode facilities.

NOR7 – PUKEKOHE NORTH-WEST UPGRADE

Notice of requirement lodged by Auckland Transport to upgrade Helvetia Road, Pukekohe in the south-west and a new corridor from Helvetia Road to SH22 Paerata in the north-east including active mode facilities.

NOR8 (AUCKLAND COUNCIL) – MILL ROAD AND PUKEKOHE EAST ROAD UPGRADE

Notice of requirement lodged by Waka Kotahi for an upgrade of Mill Road (Bombay) in the east for additional vehicle lanes and a shared path and an upgrade of Pukekohe East Road, Pukekohe in the west for a shared path.

NOR8 (WAIKATO DISTRICT COUNCIL) – MILL ROAD AND PUKEKOHE EAST ROAD UPGRADE

Notice of requirement lodged by Waka Kotahi NZ Transport Agency to designate land, under the Resource Management Act 1991 (RMA), for an upgrade of Mill Road (Bombay) in the east for additional vehicle lanes, a shared path and an upgrade of Pukekohe East Road, Pukekohe.

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Notices of requirement (NoR) under section 168 of the RMA by Waka Kotahi New Zealand Transport Agency for NoR 2: Drury to Pukekohe Link and NoR 8: Mill Road and Pukekohe East Road Upgrade.

To: Hearing Commissioners

From: Karen Bell, Consultant Planner

Report date: 15 December 2023

Scheduled hearing date: 11 March 2024

Notes:

This report sets out the advice of the reporting planner in relation to two Notices of Requirement.

Each Notice is assessed in one part of the report which allows it to be considered in its entirety by relevant submitters and the commissioners. This has resulted in repetition which has been minimised where possible.

This report has yet to be considered by the Hearing Commissioners delegated by Auckland Council (the council) to make a recommendation to the requiring authority.

The recommendations in this report are not the decisions on the notices of requirement.

A decision on the notices of requirement will be made by the requiring authority after it has considered the Hearing Commissioners' recommendations, subsequent to the Hearing Commissioners having considered the notice of requirement and heard the requiring authority and submitters.

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Summary

Requiring authority	Waka Kotahi New Zealand Transport Agency
Notices of requirement references	<ul style="list-style-type: none"> NoR 2: Drury to Pukekohe Link NoR 8: Mill Road and Pukekohe East Road Upgrade
Resource consent applications	No resource consent applications have been lodged by the requiring authority for this project.
Reporting planners	Karen Bell, Senior Principal Planner, Stantec
Site address	Refer to Form 18 Attachment A: Designation Plans and Attachment B: Schedule of Directly Affected Properties.
Lodgement date	2 October 2023
Notification date	13 th October 2023
Submissions close date	13 th November 2023
Number of submissions received	Total: NoR 2: Drury to Pukekohe Link- 32 NoR 8: Mill Road and Pukekohe East Road Upgrade- 17

Report prepared by:

Karen Bell

Senior Principal Planner

Stantec

Date:

15 December 2023

Reviewed and approved for release by:

Craig Cairncross

Team Leader

Central South

Auckland Council

Date:

15 December 2023

Abbreviations

AEE	Pukekohe Transport Network Assessment of Effects on the Environment, September 2023 v1.0
Active Mode	Walking and Cycling
AT	Auckland Transport
AUP	Auckland Unitary Plan Operative in Part
BPO	Best Practicable Option
CTMP	Construction Traffic Management Plan
DSI	Death or Serious Injuries
FULSS	Auckland Future Urban Land Supply (2017)
FDS	Future Development Strategy
FUZ	Future Urban Zone
GRPA	Government Roadway Powers Act 1989
LIP	Land Use Integration Process
LTMA	Land Transport Management Act 2003
NIMT	North Island Main Trunk
NoR	Notice of requirement
NPS-ET	National Policy Statement on Electricity Transmission 2008
NPS_FM	National Policy Statement on Freshwater Management 2020
NPS-HPL	National Policy Statement on Highly Productive Land 2022
NPS-IB	National Policy Statement on Indigenous Biodiversity 2023
NPS-UD	National Policy Statement on Urban Development 2020
NZCPS	NZ National Coastal Policy Statement 2010
OPW	Outline Plan of works
PPF	Protected Premises and Facilities
RA	Requiring Authority
RMA	Resource Management Act 1991 and all amendments
SH22	State Highway 22 (Karakara and Paerata Roads)
SGA	Te Tupu Ngātahi Supporting Growth Alliance
SSTMP	Site-Specific Traffic Management Plans
the council	Auckland Council
TAR	Threatened and At-Risk
ULDMP	Urban and Landscape Design Management Plan
UDE	Urban Design Evaluation
Waka Kotahi	Waka Kotahi NZ Transport Agency
WDC	Waikato District Council

1 Introduction

1.1 The notices of requirement

Pursuant to section 168 of the RMA, Waka Kotahi New Zealand Transport Agency (Waka Kotahi) as the requiring authority, has lodged two notices of requirement (NoR) for a designation for in the Auckland Unitary Plan (operative in part) (AUP).

Each NoR has been assessed by the reporting planner and is set out in specific sections of this report below.

- NoR 2 - Section 6
- NoR 8 - Section 7

NoR 8 was also submitted to Waikato District Council (WDC) in relation to that part of Mill Road located outside the Auckland Region. That NoR is being reported on separately.

The two NoRs are part of a group of eight NoRs referred to as the sought by the Supporting Growth Alliance ('SGA') on behalf of Waka Kotahi NZ Transport Agency and Auckland Transport. The background to the package of NoRs that are collectively referred to as the proposed Pukekohe Transport Network (the Project) in the lodged documents is outlined in Section 3 below.

1.2 Locality plan

The general location of the Project is shown on Figure 1-1 below. The reader is also referred to the NoR plan set which outlines the extent of the existing designations and the extent of the NoR. The plan set is referenced as Attachment A: Designation Plans to Form 18.

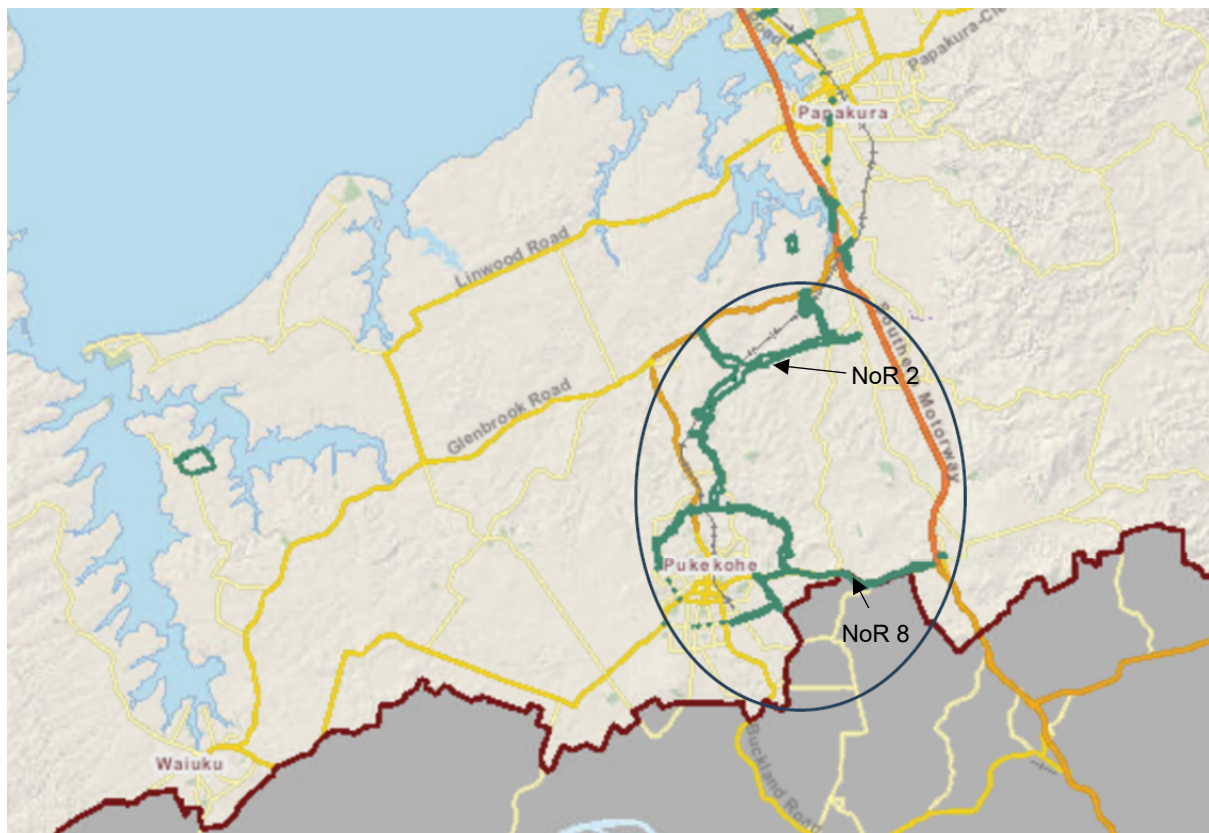


Figure 1-1 General location plan of designations of the Pukekohe Transport Network (this plan also shows the two designations sought by Waka Kotahi)

1.3 Notice of requirement documents

The lodged NoRs being reported on in this document consist of the following documents:

Volume 1: Form 18 for each of NoR 2 and NoR 8 that includes:

- Attachment A: Designation Plans.
- Attachment B: Schedule of Directly Affected Properties; and
- Attachment C: Conditions of Designation.

Volume 2: Pukekohe Transport Network Assessment of Effects on the Environment, September 2023 v1.0 that includes:

- Appendix A: Pukekohe Transport Network Assessment of Alternatives Report September 2023.

Volume 3: Concept Design Drawings / General Arrangement Layout Plans

Volume 4: Supporting Technical Assessments that includes:

- Appendix A: Pukekohe Transport Network Assessment of Transport Effects September 2023.
- Appendix B: Pukekohe Transport Network Assessment of Construction Noise and Vibration Effects September 2023.
- Appendix C: Pukekohe Transport Network Assessment of Operational Noise Effects September 2023.
- Appendix D: Pukekohe Transport Network Assessment of Flood Hazard Effects 12/09/2023.
- Appendix E: Pukekohe Transport Network Assessment of Ecological Effects September 2023.
- Appendix F: Pukekohe Transport Network Assessment of Landscape and Visual Effects September 2023.
- Appendix G: Pukekohe Transport Network Assessment of Effects on Historic Heritage September 2023.
- Appendix H: Pukekohe Transport Network Assessment of Arboricultural Effects September 2023; and
- Appendix I: Pukekohe Transport Network Urban Design Evaluation September 2023.

Given the large quantum of information supporting the NoRs, it has not been attached to this report. Instead, the information can be found on the Auckland Council website.

The review of the documents submitted concluded that there was sufficient information lodged and it was not necessary to request further information from the requiring authority. This is largely due to a review of the draft documents having been undertaken prior to lodgement.

1.4 Specialist reviews

The assessment in this report takes into account reviews and advice from the following technical specialists engaged by the council:

Specialist	Specialty	Dated
Wes Edwards, Arrive Limited	Transport	12 December 2023
Rebecca Skidmore, Skidmore Urban Design	Landscape and Visual, and Urban Design.	14 December 2023
Rhys Hegley, Hegley Acoustic Consultants	Noise and Vibration	December 2023
Simon Chapman, Ecology NZ	Ecology	14 December 2023

Trent Sunich, formerly 4 Sight now SLR.	Flooding/ Stormwater	14 December 2023
Leon Saxon, Arborlab	Arboriculture	6 December 2023
Myfanwy Eaves, Auckland Council	Heritage	6 December 2023

These specialist reviews are included in Attachment 3.

1.5 Lapse Period

Section 184 of the RMA provides for a designation to lapse five years after it is included in the District Plan unless:

- a) It has been given effect to; or
- b) Within three months of the designation lapsing, the territorial authority determines that substantial progress or effort has been and continues to be made towards giving effect to the designation, or
- c) The designation specifies a different lapse period

The SGA states that a key objective of the Te Tupu Ngātahi Supporting Growth Programme is to identify and protect land now for future transport networks to support growth ¹. In line with this objective SGA has sought an extended lapse period for NoR 2 and NoR 8 and for all of the other NoRs required for the Pukekohe Transport Network of 20 years.

The rationale for the period is set out in Section 7.1 of the AEE and includes:

- It provides statutory protection of the land required for transport infrastructure to support future growth in a manner that recognises the uncertainty associated with the timing of that growth.
- It supports efficient land use and transport integration by enabling the efficient delivery of transport infrastructure at a time and in a way that is integrated with future urbanisation.
- It provides the Requiring Authorities sufficient time to:
 - Obtain funding;
 - Undertake tendering / procurement;
 - Undertake property and access negotiations and other processes associated with construction of the projects;
 - Undertake the detailed design of the projects; and
 - Obtain the necessary resource consents and other statutory approvals.
- It provides property owners, businesses and the community certainty on where transport routes will be located (i.e., within the designation boundaries).
- The AEE cites other examples of project with long lapse periods and the implications of extended lapse period.
- The appropriateness of the proposed lapse date in relation to NoR 2 is assessed in section 6.6.15 Property and land use effects of this report where the submissions that question the appropriateness of the proposed lapse period are considered.

Section 184 of the Act gives discretion to alter the lapse period for a designation from the default five years. The Environment Court decision in *Beda Family Trust v Transit NZ A139/04* makes the following statement on the exercise of that discretion in considering a longer lapse period:

The discretion has to be exercised in a principled manner, after considering all of the circumstances of the particular case. There may be circumstances where a longer period than the statutory 5 years is required to

¹ AEE section 7

secure the route for a major roading project. Such circumstances need to be balanced against the prejudicial effects to directly affected property owners who are required to endure the blighting effects on their properties for an indeterminate period. The exercise of the discretion needs to be underlain by fairness.

Environment Court decisions on disputed designation lapse periods are noted in the following table for reference purposes.

Case	Requested lapse period	Court decision lapse period
Beda Family Trust v Transit NZ	20 years	10 years
Meridian 37 Ltd v Waipa District Council	15 years	5 years
Hernon v Vector Gas Ltd	10 years	5 years
Queenstown Airport Corporation Ltd	10 years	5 years

The RMA does not provide any guidance as to when it is appropriate to extend a lapse period, however, there is clear discretion to extend lapse periods beyond the default period when confirming a designation. The appropriateness of extending the lapse period beyond the 5 years set as the default must depend on the specific circumstances. The relevant factors need to be balanced.

2 Consultation

Section 10 of the Pukekohe Transport Network Assessment of Effects on the Environment, September 2023 v1.0 (the AEE) details the engagement that has been undertaken on behalf of Waka Kotahi by the SGA. This engagement has extended from the indicative business case stage commencing in 2018 through to the development of the detailed business case and the notice of requirement.

The engagement has included a range of parties and stakeholders described under the headings: partners; elected members; stakeholders; community; and potentially affected landowners.

Section 10.2.1 of the AEE outlines the engagement with partners, listed as being Mana Whenua, KiwiRail and Auckland Council.

Section 10.2.2 of the AEE outlines the engagement with stakeholders, listed as being Local Boards; Developers; Grace James Road Focus Group; Pukekohe Business Association, Pukekohe Vegetable Growers Association, Birch Land Development Consultants, A&P Showgrounds, and Network Utilities.

Section 10.2.3 of the AEE outlines the engagement with the community and Section 10.2.4 the engagement with potentially affected landowners.

3 Background

As set out in the Pukekohe Transport Network Assessment of Effects on the Environment (AEE)², Waka Kotahi is approved under s 167 of the RMA as a Requiring Authority to designate land, water, subsoil or airspace for the "construction and operation (including the maintenance, improvement, enhancement, expansion, realignment and alteration) of any State highway or motorway pursuant to the GRPA³. Waka Kotahi may also designate land, water, subsoil or airspace for "the purpose of constructing or operating (or proposing to construct or operate) and maintaining cycleways and shared paths in New Zealand pursuant to the GRPA and the LTMA".

² Te Tupu Ngātahi Supporting Growth, September 2023 v1.0

³ NZ Gazette, Notice Number 1994-go1500

The Auckland Plan 2050 signals that Auckland could grow by 720,000 people over the next 30 years, generating demand for more than 400,000 additional homes and requiring land for 270,000 more jobs. Around a third of this growth is expected to occur in Future Urban zoned areas identified within the AUP.

Waka Kotahi is part of Te Tupu Ngātahi Supporting Growth (Te Tupu Ngātahi) a collaboration with Auckland Transport (AT) to plan transport investment in Auckland’s future urban zoned areas over the next 10 to 30 years.

The key objective of Te Tupu Ngātahi is to protect land for future implementation of the required strategic transport corridors/infrastructure. As a form of route protection, designations will identify and appropriately protect the land necessary to enable the future construction, operation and maintenance of these required transport corridors/infrastructure.

Section 3.1 of the AEE notes that current transport network is already under pressure and future transport demands will exacerbate existing issues, limiting Pukekohe, Paerata and Drury West’s (collectively referred to as Pukekohe in this report) growth potential. Eight transport improvement projects are proposed by Te Tupu Ngātahi for the proposed Pukekohe Transport Network. The projects include provision for improved walking and cycling, public transport, and general traffic connections to improve connectivity and resilience providing high quality, safe and attractive transport environments.

The eight projects involve nine different NoRs. Three of the NoRs are from Waka Kotahi and six from AT. The Table below (taken from the AEE) contains a description of each of the NoRs. This s42a report covers the two NoR’s submitted by Waka Kotahi to Auckland Council shown in **bold** in the table.

NoR	Project	Requiring Authority	Council	Description
NoR 1	Drury West Arterial	AT	Auckland Council	A new transport corridor with active mode facilities in Drury West extending south from the intersection of SH22 and Jesmond Road to the edge of the Future Urban Zone near Runciman Road, Drury.
NoR 2	Drury Pukekohe Link	Waka Kotahi	Auckland Council	A new state highway including a shared path. It includes sections of new and upgrades of existing transport corridors from Great South Road, Drury in the north-east, connecting to State Highway 22 in the west, and the area in the vicinity of Sim Road/Cape Hill Road, Pukekohe in the south.
NoR 3	Paerata Connections	AT	Auckland Council	Two new transport corridors including active mode facilities: One new connection between the existing Sim Road (south) and the Paerata Rail Station. The second new connection between the two extents of Sim Road across the North Island Main Trunk (NIMT).
NoR 4	Pukekohe North-East Arterial	AT	Auckland Council	A new transport corridor including active modes from SH22, Paerata in the north-west to Pukekohe East Road, Pukekohe in the south-east.
NoR 5	Pukekohe South-East Arterial	AT	Auckland Council	A new and upgraded transport corridor in Pukekohe including

NoR	Project	Requiring Authority	Council	Description
				active mode facilities. It upgrades part of Pukekohe East Road and Golding Road and a new connection between Golding Road (north of Royal Doulton Drive) and to Svendsen Road across Station Road and the NIMT.
NoR 6	Pukekohe South-West Upgrade	AT	Auckland Council	The upgrade of specific intersections and the regrade of specific driveways on Nelson Street, Ward Street, West Street and Helvetia Road for active mode facilities.
NoR 7	Pukekohe North-West Arterial	AT	Auckland Council	The upgrade of Helvetia Road, Pukekohe in the south-west and a new corridor from Helvetia Road to SH22 Paerata in the north-east including active mode facilities.
NoR 8	Mill Road and Pukekohe East Road Upgrade	Waka Kotahi	Auckland Council	An upgrade of Mill Road (Bombay) in the east for additional vehicles lanes and a shared path and Pukekohe East Road, Pukekohe in the west for a shared path.
NoR 8	Mill Road and Pukekohe East Road Upgrade	Waka Kotahi	Waikato District Council	

Waka Kotahi's project Mill Road and Pukekohe East Road Upgrade involves two NoRs as the centre line of both roads is the boundary between the Auckland and Waikato District Councils for part of the Mill Road and Pukekohe East Road Upgrade Project. The NoR for the works in the Waikato District is covered in a separate report.

4 Notification and submissions and Local Board views

4.1 Notification

The NoRs were publicly notified on 13 October 2023.

The closing date for submissions was 13 November 2023.

4.2 Consideration of Submissions received

4.2.1 Submissions to NoR 2

In relation to NoR 2, 32 submissions were received from the following submitters:

Submission Number	Submitter Name	Position
1	Lloyd Harrison and Evelina Ah-Wong	oppose
2	Stuart Owers	oppose
3	Rachel Beaurain	oppose
4	Mr. Barnardus Jacobus Beaurain	oppose
5	Telecommunications Submitters	oppose in part

Submission Number	Submitter Name	Position
6	Catherine Joyce	oppose
7	Madeline Robb	oppose
8	Bruce and Louise Postles	oppose
9	John Ruddell	oppose
10	Todd Matthew Brown	oppose
11	Roger Farley	oppose
12	Glen McCall	oppose
13	David And Sue Carpenter	oppose
14	XLU limited	oppose
15	Michael Colin Dane	oppose
16	PD & RA Berry	oppose
17	Fisher & Paykel Healthcare Limited	support
18	D & K Sim Ltd	oppose
19	Trevlyn Enterprises	oppose
20	Peter Sim	oppose
21	Roading & Asphalt Ltd	oppose
22	Public Works Advisory Limited	neutral
23	John Christopher Thompson	oppose
24	KiwiRail Holdings Limited	support
25	McKean Family Trust	oppose in part
26	Watercare Services Limited	neutral
27	Ministry of Education	neutral
28	Paerata 5 Farms Limited	oppose
29	Counties Energy Limited	support with amendments
30	The Campaign for Better Transport Incorporated	neutral
31	Peter Haddad	oppose
32	Hugh and Rae Ross	not stated

No late submissions were received in relation to NoR 2.

The consideration of submissions to NoR 2 has been included within Section 6 of this report alongside the analysis of environmental effects. The submissions have either been grouped where they are raising matters or seeking relief on the same theme or addressed individually where it relates to a specific matter i.e. network utility/infrastructure providers. Copies of submissions are included in Attachment 1. A summary of the issues raised in submissions is contained in Attachment 4.

4.2.2 Submissions to NoR 8

In relation to NoR 8 in Auckland 17 submissions were received from the following submitters:

Submission Number	Submitter Name	Position
1	Anthony van Schalkwyk	support

Submission Number	Submitter Name	Position
2	AMJG Investment Attn:	neutral
3	Cade Hubert Daroux	Oppose
4	Maimere Properties Ltd	neutral
5	MC Johnstone LJC Johnstone LF Williams	neutral
6	Telecommunications Submitters	oppose in part
7	Chaein Jeon	neutral
8	Deirdre Twentyman	Oppose
9	Rodney Cunningham	Oppose
10	Paul Reynolds	Oppose
11	Heritage New Zealand Pouhere Taonga	support
12	First gas Ltd	neutral
13	Watercare Services Limited	Neutral with amendments
14	Ministry of Education	Neutral with amendments
15	Counties Energy Limited	Support with amendments
16	The Campaign for Better Transport Incorporated	Support with amendments
17	Harjinder Singh	Oppose

No late submissions were received in relation to NoR 8.

The consideration of submissions to NoR 8 has been included within Section 7 of this report alongside the analysis of environmental effects. Copies of submissions are included in Attachment 1. A summary of the issues raised in submissions is contained in Attachment 4.

4.3 Local Board Views

The two NoRs from Waka Kotahi are located on land within the boundaries of the Franklin Local Board. Views were sought from the Franklin Local Board. The Board provided their view on information on Te Tupu Ngātahi Supporting Growth on Future Transport Networks Pukekohe-Paerata and south Drury provided to the local board prior to a meeting on 27 June 2023 as noted in the AEE and have more recently considered the NoRs after notification. The Local Board views are provided in Attachment 2 to this report, noting that .

In relation to NoR 2 the board resolved to **“Recommend that the Highway from Ramarama to Pukekohe retains space for four lanes rather than the proposed two lanes, noting that the population in Pukekohe is likely to significantly exceed current growth projections in response to the National Policy Statement for Urban Development.”**

In relation to NoR 8 the board resolved to: **Support the four laning of Mill Rd to Harrisville Rd, but recommend more work done on an alternative connection point to the Pukekohe ring road. This would involve working with Waikato District Council because of the border issues in this area, however the board notes that this is possible and has been undertaken as part of other notices in this package.**

In addition, the Local Board resolved:

- b) **whakaae / agree that this programme of work is essential in supporting the future planning of Pukekohe-Paerata and south Drury, and future economic, environmental, social, and cultural well-being in the area**
- c) **tautoko / support the inclusion of cycling and walking infrastructure in general and recommend that the Pukekohe-Paerata Paths Plan is referenced when assessing the suitability of NoR notices**

- d) **tuhi ā taipitopito / note that that this package does not adequately address the needs of freight that are unique to the wider Pukekohe area or the likely negative impacts of freight traffic use of the network on significant quality of life and safety in the local community**
- e) **recommend careful consideration on whether the scope of notices facilitates effective and safe freight movement which should be prioritised to enable carbon emissions to be reduced in line with regional and national climate policy**
- f) **reiterate that it is essential that planning and designation of key intersection treatments e.g. the intersection of Blackbridge Road and State Highway 22 and the Bombay interchange are critical to achieving the purpose of this programme and strongly recommend these are considered in the context of the NoR process; however acknowledge that this is outside the scope of the Notice of Requirement process**
- g) **recommend that the expansion of the NZ Steel site at Glenbrook, which will develop 300 hectares of industrial land and increase south-bound freight and general vehicle movements, is considered as part of the notice assessment**

The board delegated a board member to speak to the local board views at a hearing.

5 Consideration of the Notices of Requirement

The RMA provides that the procedures adopted in processing a notice of requirement are generally those adopted for processing a resource consent application. This includes lodgement, requiring further information, notification, receiving and hearing of submissions. In respect of NoRs 2 and 8, all of those procedures have been followed.

The procedure differs from the resource consent process in respect of the council consideration of the NoR. Section 171(1) of the RMA states:

- (1) *When considering a requirement and any submissions received, a territorial authority must, subject to Part 2, consider the effects on the environment of allowing the requirement, having particular regard to—*
 - (a) *any relevant provisions of—*
 - (i) *a national policy statement;*
 - (ii) *a New Zealand coastal policy statement;*
 - (iii) *a regional policy statement or proposed regional policy statement;*
 - (iv) *a plan or proposed plan; and*
 - (b) *whether adequate consideration has been given to alternative sites, routes, or methods of undertaking the work if—*
 - (i) *the requiring authority does not have an interest in the land sufficient for undertaking the work; or*
 - (ii) *it is likely that the work will have a significant adverse effect on the environment; and*
 - (c) *whether the work and designation are reasonably necessary for achieving the objectives of the requiring authority for which the designation is sought; and*
 - (d) *any other matter the territorial authority considers reasonably necessary in order to make a recommendation on the requirement.*

Section 171(1)(a) is addressed in sections 6.7 – 6.9 in relation to NoR 2 and sections 7.7-7.9 in relation to NoR 8 below.

Section 171(1)(b) is addressed in section 6.10 in relation to NoR 2 and section 7.10 in relation to NoR 8 below.

Section 171(1)(c) i is addressed in section 6.11 in relation to NoR 2 and section 7.11 in relation to NoR 8 below.

Section 171(1)(d) is addressed in section 6.12 in relation to NoR 2 and section 7.12 in relation to NoR 8 below.

Section 171(1) is subject to Part 2 of the RMA. Part 2 contains the purpose and principles of the RMA. It has been confirmed by the Environment Court that, in relation to a designation matter:

...all considerations, whether favouring or negating the designation, are secondary to the requirement that the provisions of Part II of the RMA must be fulfilled by the proposal.⁴

After considering these matters, the council needs to make a recommendation to the requiring authority under section 171(2) of the RMA which states:

- (2) *The territorial authority may recommend to the requiring authority that it –*
 - (a) *confirm the requirement:*

⁴ See Estate of P.A. Moran and Others v Transit NZ (W55/99)

- (b) *modify the requirement:*
- (c) *impose conditions:*
- (d) *withdraw the requirement.*

Reasons must be given for the recommendation under section 171(3) of the RMA. Refer to section 6.16 in relation my recommendation on NoR 2 and section 7.16 in relation to my/our recommendation on NoR 8.

6 NoR 2 Drury Pukekohe Link

6.1 Proposal - Form 18⁵

Waka Kotahi is proposing a 10.6km long designation for the 'Construction, operation and maintenance of a state highway from Drury to Pukekohe including active transport facilities and associated infrastructure'. As shown in Figure 6-1 below it extends from Great South Road and across Runciman Road where it meets Auckland Transport's NoR 1 (Drury West Arterial) and includes land under the 220-volt Transpower Transmission Line Glenbrook Deviation A covered by the National Grid Corridor Overlay in the AUP. It extends to the North Island Main Trunk(NIMT) rail corridor where it bifurcates and moves north over the rail corridor to connect to Karaka Road/ State Highway 22 and continues on the southern side of the rail corridor to Sim Road where it overlaps with the two parts of Auckland Transport's NoR 3 (Paerata Connections). The NoR then follows and includes Sim Road and land adjacent to the road to the intersection of Tuhimata Road and Cape Horn Road where it then widens to include part of Cape Hill Road and connects to Auckland Transport's NoR 4 (Pukekohe North -East Arterial) to the south.

The NoR provides for sections of new transport corridor and upgrades/widening to existing transport corridors and covers approximately 1587.6 hectares of land.

Waka Kotahi is requesting a 20-year lapse period.

The project objectives are:

Provide for a new and upgraded transport corridor between Drury and Pukekohe that:

- a. Improves connectivity
- b. Is safe
- c. Provides resilience in the transport network
- d. Integrates with and supports planned urban growth
- e. Integrates with and supports the existing and future transport network
- f. Improves travel choice and contributes to mode shift

The designation footprint includes provision for:

- A state highway with a shared path;
- Associated works including intersections, bridges, embankments, retaining, culverts and stormwater management systems (described in Section 11.7 of the AEE as treatment swale and wetlands);
- Changes to local roads, where the proposed work intersects with local roads; and
- Construction activities including construction areas, construction traffic management and the re-grade of driveways.

⁵ Form 18 Notice Of Requirement For A Designation Of Land Waka Kotahi New Zealand Transport Agency NoR 2 – Drury to Pukekohe Link dated 2 October 2023

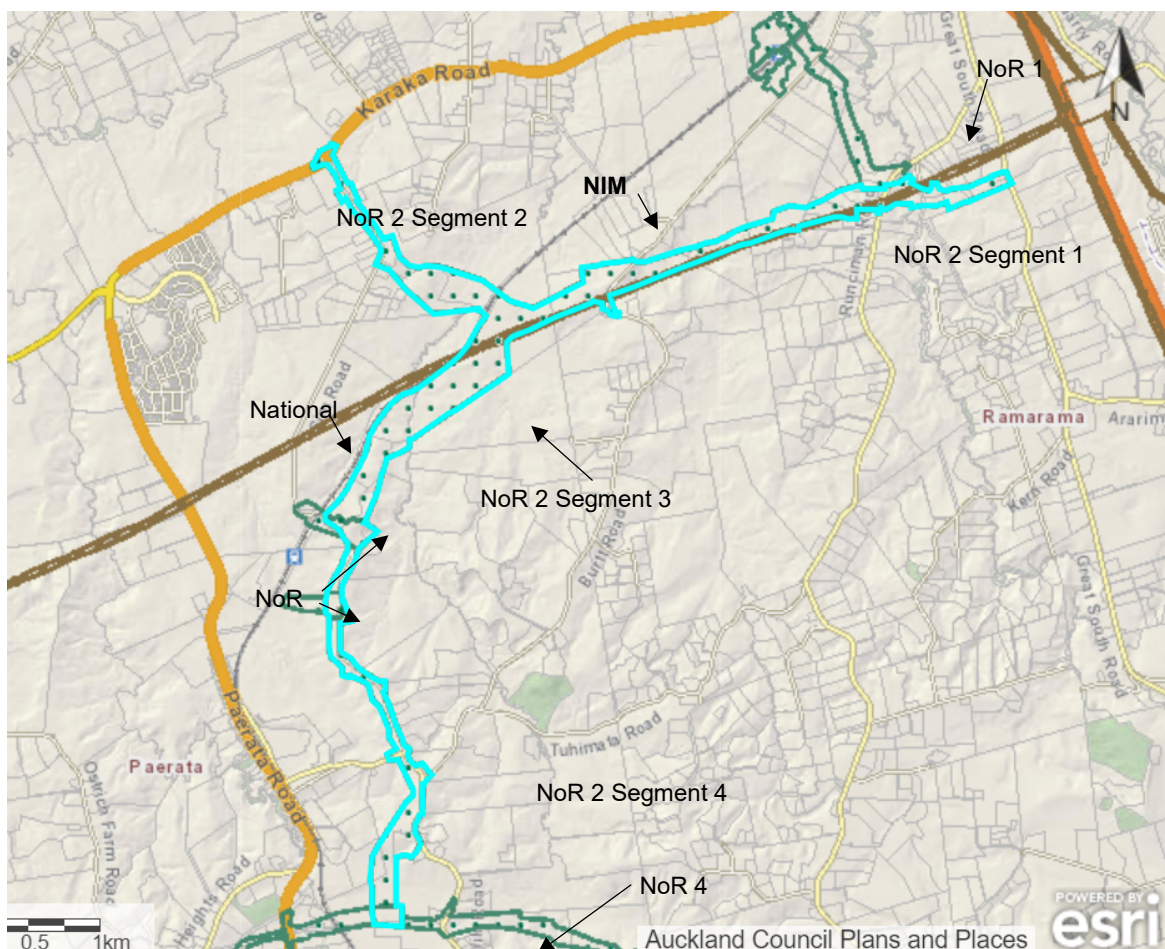


Figure 6-1 NoR 2 Drury To Pukekohe Link and other NoRs and infrastructure (sourced from Auckland Council Geomaps).

Proposed conditions are included with the Form 18 Notice. These conditions are generally common to both of Waka Kotahi’s NoRs except that there is no Historic Heritage Management Plan condition or a Tree Management Plan condition for NoR 2, and there is variation in terms of the details of a number of conditions.

6.2 Affected land

The requirement is described in the Form 18 Notice as applying to 52 land parcels (excluding local roads) although the table in section 3.2 of the AEE, notes that there are 61 properties directly affected (i.e. the designation boundary will extend across these parcels). 56 are noted as being privately owned. The amount of land required on each of these land parcel as shown in Form 18 Attachment B: Schedule of Directly Affected Properties ranges from 135,792m² at 229 Cape Hill Road (the largest) to 30m² at 90 Sim Road. The directly affected land is in one of three zones: Rural – Countryside Living, Rural – Mixed Rural and Future Urban.

The affected land is identified in the designation plans that are provided in Form 18 Attachment A: Designation Plans and the schedule of directly affected properties provided in Form 18 Attachment B: Schedule of Directly Affected Properties. The directly affected land is required for the project and associated works.

The table in section 3.2 of the AEE notes that the land use of the directly affected land includes pastoral, working agricultural, rural and residential. The following existing dwellings are located within the designation footprint⁶ :

1. 375 Burt Road

⁶ Table 4-1 Assessment of Construction Noise and Vibration Effects

2. 301A Cape Hill Road
3. 301 B Cape Hill Road
4. 11 Crown Road
5. 1238 Great South Road
6. 1242 Great South Road
7. 21 Ngakoroa Road
8. 22 Ngakoroa Road
9. 777 Runciman Road
10. 785 Runciman Road
11. 787 Runciman Road
12. 791 Runciman Road
13. 792 Runciman Road
14. 77 Sim Road
15. 319 B Sim Road
16. 319 C Sim Rod
17. 319 D Sim Road
18. 319E Sim Road
19. 42 Sim Road

The table notes that there are four 'hydro' properties and a rail property also affected. The schedule and designation plans also include sections of the following roads (Cape Hill, Sim, Tuhimata, Burt, Runciman, Ngakoroa, Karaka and Great South Roads).

6.3 Site, locality, catchment and environment description.

6.3.1 Overview

The AEE breaks NoR 2 into four segments (refer Figure 6-1 above and depicted in Figure 9-8 of the AEE). They are:

1. South Drury Connection
2. SH22 Connection
3. Drury-Paerata Link
4. Paerata Arterial Link

A description of the receiving environment and the works on land directly affected by the designation is contained in the AEE and within each of the technical assessments which should be read in conjunction with this report.

In relation to the approach to assessing the likely receiving environment, section 8.4 of the AEE outlines that assessing the effects on the environment as it exists today will not provide an accurate reflection of the environment in which the effects of the construction and operation of the transport corridor will be experienced. Therefore, the AEE sets out today's land use, zoning type, likelihood of change for the environment (ranging from low to high) and the likely future zoning that relates to those areas subject to the Future Urban zone.

The likely future environment or likely future zone in relation to NoR 2 is based the Drury – Opaheke Structure Plan that applies in the case of the South Drury Connection segment and the Pukekohe – Paerata Structure Plan in the case of the Paerata Arterial Segment. The AEE points to the Residential Mixed – Housing Urban zone as being the zone that is likely to apply to the Future Urban zoned land. In relation to the land zoned Rural, the AEE assumes that there is a low likelihood of change.

NoR 2 is located on land subject to the High Use Aquifer Management Area Overlay. NoR 2 also traverses a large number of Flood Plains, Flood Prone Areas, and Overland Flow Paths that are also identified as permanent streams in Auckland Council's Geomaps (Catchment and Hydrology). Sections of the streams are currently piped under the rail corridor and roads.

The main components of the proposed works designation in each section of the NoR is summarised below.

6.3.2 Segment 1: South Drury Connection

Refer section 9.4 of the AEE for a description of the receiving environment and the works on land directly affected by the designation. This segment extends from Great South Road in the east at the proposed SH1 Drury South Interchange to Burt Road has the following main components:

- An indicative 28m wide cross section with two lanes for general traffic, with active transport facilities on one side of the corridor. A generic cross section is shown in Figure 9-9 of the AEE.
- Three new bridges over tributaries of the Ngakoroa Stream.
- Three stormwater wetlands and new culverts and swales.

The alignment of this section essentially follows the National Grid. Part of the South Drury Arterial segment is located in the Countryside living zone from Loop Road to Ngakoroa Road and is largely in the Future Urban Zone(**FUZ**) and from Ngakoroa Road to Burt Road with the designation following the Rural Urban Boundary (RUB).

6.3.3 Segment 2: SH22 Connection

Refer section 9.5 of the AEE for a description of the receiving environment and the works on land directly affected by the designation. This segment follows Sim Road from Karaka Road /SH22 and then veers off to cross over the rail corridor to connect to Segment 3 Drury-Paerata Link and has the following main components:

- An indicative 24m wide cross section with two lanes for general traffic and active transport facilities on one side of the corridor, as shown in Figure 9-12 of the AEE.
- Two bridges over tributaries of the Oira Creek and NIMT.
- Two stormwater wetlands and new culverts and swales.
- The SH22 Connection segment crosses the NIMT and links to the northern end of Sim Road and is also in in the Rural- Mixed Rural zone although there is Residential – Mixed Housing Urban zone to the west.

6.3.4 Segment 3: Drury-Paerata Link

Refer section 9.6 of the AEE for a description of the receiving environment and the works on land directly affected by the designation. The Drury Paerata Link is located either in or adjacent to the Transpower Transmission line and is to the south of the NIMT and has the following main components:

- An indicative 24m wide cross section with two lanes for general traffic and active transport facilities on one side of the corridor, shown in Figure 9-15 in the AEE.
- Two bridges over tributaries of the Oira Creek.
- Three stormwater wetlands and new culverts and swales.

The Drury Paerata Link segment travels along the southern side of the NIMT and is largely located in the Rural-Mixed Rural zone although there is Residential – Mixed Housing Urban zone to the north for the section between the SH22 Connection and AT's Paerata Connection.

6.3.5 Segment 3: Paerata Arterial Link

Refer section 9.7 of the AEE for a description of the receiving environment and the works on land directly affected by the designation. The Paerata Arterial Link includes Sim Road and Cape Horn Road for the most part and has the following main components:

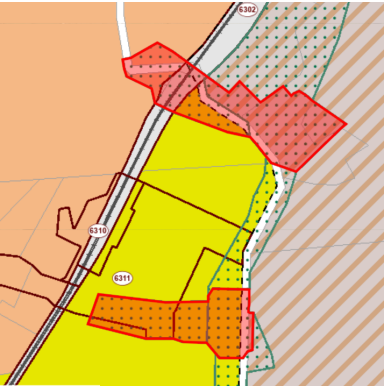
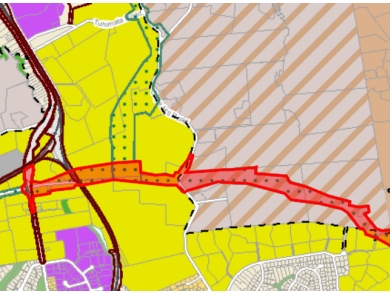
- An indicative 24m wide cross section with two lanes for general traffic and active transport facilities on one or both sides of the corridor, shown in Figure 9-18 of the AEE.
- No bridges are proposed.
- Six stormwater wetlands (one shared with NoR 4 and one shared with NoR 3) and new culverts.

As noted in 9.7.2 of the AEE there is an SEA (SEA_T_4380) located some 800plus metres to the east of project area on Cape Hill Road (although the project does not intersect with it).

The Paerata Arterial Link segment is almost entirely in the FUZ with the designation following for the most part the Rural Urban Boundary (RUB) which is on the western side of Sim Road in that segment. South of Tuhimata Road the Paerata Arterial Link includes Cape Hill Road as its eastern edge before moving into the FUZ land to connect with NoR 4.

6.4 Other designations, notices of requirement, and consent applications

The land within or adjoining the NoR is subject to a number of existing designations, notices of requirement and as summarised in section 8 of the AEE. The table below summarises those related to NoR 2 at this time.

Project	Interface with NoR 2	Status
Waka Kotahi State Highway 22 designation (Karaka Road and Paerata Road) from east of Woodlyn Drive, Karaka to Adams Drive, Pukekohe (reference 6704)	NoR 2 will connect to SH22 Karaka Road at the Sim Road intersection	The KiwiRail designation is the primary designation
KiwiRail North Island main trunk line (reference 6302)	NoR 2 segment 2 SH22 Connection crosses over the NIMT .	The KiwiRail designation is the primary designation.
KiwiRail / Auckland Transport NIMT four tracking and Active Modes Corridor (AMC) KiwiRail designation NIMT (reference 6302)	NoR 2 crosses over the NIMT connecting Sim Road to Burt Road. Future four tracking and AMC are proposed. Space allocation was taken into consideration when designing structures over the NIMT.	KiwiRail and AT Programme Business Case is underway.
Waka Kotahi SH1 Papakura to Bombay Motorway Project	NoR 2 interfaces with the project at the proposed Drury South Interchange at SH1 / Great South Road	The AEE indicated that Waka Kotahi is likely to lodge Notices of Requirement for route protection in late 2023.
Auckland Transport - Notice of Requirement 2 Paerata Connections	<p>NoR 2 interfaces with the Notice of Requirement shown in red in two locations along Sim Road</p> 	The Notice of Requirement was lodged at the same time as NoR 2 and is referred to as NoR 3. Paerata Connections
Auckland Transport - Notice of Requirement 4 Pukekohe North East Arterial	<p>The southern end of NoR 2 interfaces with the Notice of Requirement shown in red</p> 	The Notice of Requirement was lodged at the same time as NoR 2 and is referred to as NoR 4 Pukekohe North-East Arterial

Project	Interface with NoR 2	Status
Plan Change 78 (PC78)	NoR 2 interfaces with Residential -Mixed Housing Urban zone land located to the north of the NIMT rail corridor and Sim Road that is subject to PC78.	This plan change has been notified and although hearings have commenced no decision has been released.

As identified in section 9 of the AEE there are a number of developer-led plan changes, resource consents and developer interest in Pukekohe in proximity to the Pukekohe Transport Network. None of the land subject to the plan changes or resource consents listed in section 9 adjoin or are directly affected by NoR 2.

6.5 Effects on the environment

Effects on the environment are addressed in section 11 of the AEE. The following discussion addresses effects in the same order they are addressed in the AEE with additional matters included at the end. The relevant specialist reports are referred to and are included in Attachment 3. Submissions have also been considered and are referred to where relevant. These should be read in conjunction with this report.

6.5.1 Effects to be disregarded - Trade competition

We do not consider that there are any trade competition effects.

6.5.2 Effects that may be disregarded – Written approvals

No written approvals were included with NoR 2.

6.5.3 Positive effects

Requiring Authority AEE

The AEE describes the positive effects and outcomes that the Pukekohe Transport Network as a whole will provide. These are related primarily to transport and include:

- Improved safety, and consequential reductions in the risk of Death or Serious Injuries (DSI's) for all road users;
- Improvements to walking and cycling facilities;
- Improvements to public transport facilities (connecting to key rapid transit stops); and
- Improvements to general traffic and freight (including increased connectivity, capacity, safety and resilience of the network) will provide the following benefits.

Specialist Review

Wes Edwards of Arrive Ltd has reviewed the transport assessment and notes that the Projects collectively are intended to accommodate the increased demand for travel generated by the growth expected to occur in the southern Auckland and northern Waikato regions while addressing some of the adverse effects of that increase. He notes that for that reason alone the Projects have significant benefits.

The review also notes that the assessment material provided by SGA evaluates the benefits of the Projects assuming that all development would occur with or without the Projects however Wes Edwards is of the view that much of the development is unlikely to occur without the Projects, which has not been accounted for in the ATE benefits analysis, although the interplay is acknowledged. He points out that the benefits attributed to the Projects may not all occur unless all of the planned growth also occurs and will be less than expected in a partial implementation situation.

Planning Review

I consider that the proposed works enabled through NoR 2 will have significant positive transport effects for the reasons outlined in the AEE.

The positive community effects are similar to the transport effects and I agree with the AEE in terms of these.

The positive terrestrial ecology effects identified in the AEE appear to be related largely to the delivery of stormwater management measures and landscaping. Many of these measures will be linked to future regional consents required for stormwater discharge, earthworks and vegetation removal and works affecting streams and wetlands and will be mitigating the effects of the physical works. As outlined in the AEE and the Pukekohe Transport Network – Assessment of Ecological Effects⁷ specific assessments of the current conditions along the route have not been undertaken in relation to the current conditions of the ecological values present.

It is assumed that the best practice measures that will be expected at the time that the resource consents are applied for, will deliver the claimed enhancements / positive effects on the existing environment. Therefore, it is agreed that there will be positive effects given the extent of brownfield, exotic grassland, scrub that is within and adjacent to the NoR 2 designation extent and the opportunity through the works to improve indigenous biodiversity. However, it is not clear how the works will affect the specific values that are present or the scale of the positive terrestrial ecology effects of the NoR at this time.

There are a number of matters listed under Landscape and Visual that are also linked to urban design benefits that I agree will be positive effects and contribute to the creation of an appropriate future urban environment. These include enhanced connectivity; integration of active travel routes and recreational paths and reduction in speed and new landscaping that will create attractive environments which can enhance the built character. However not all of the route is at this time expected to become an urban environment given the extent of rural zoned land along the route that is located outside the RUB. Determining the nature of the benefit in the case of NoR 2 is also challenging as the details of the adjacent built environment in the FUZ are still to be developed.

Also listed as a positive effect is the addition of trees in the new cross sections to enhance the urban landscape where there is room. I agree that these are potential positive effects. The challenge in terms of the assessment of the scale of these positive arboriculture and landscape effects is that they are only able to be delivered through the conditions of NoR 2.

The Project Description for NoR 2 as set out in Schedule 1 of Form 18 is

“The proposed work is the construction, operation, maintenance and improvement of a state highway from Drury to Pukekohe including cycleway and / or shared path and associated infrastructure. The proposed work is shown in the following Concept Plan and includes:

- A state highway with cycleway and / or shared path;
- Associated works including intersections, bridges, embankments, retaining, culverts and stormwater management systems;
- Changes to local roads, where the proposed work intersects with local roads; and
- Construction activities including construction areas, construction traffic management and the re-grade of driveways.

The Concept Plan in Form 18 is at such a level that there is no detail to be seen. There is also a requirement to deliver a concept plan under condition 10(f).

Therefore, the conditions are very important in delivering the positive effects identified.

The relevant condition in relation to many of these positive effects is Condition 10 related to the provision of the Urban and Landscape Design Management Plan (UDLPM) which uses ‘where appropriate’ and ‘where practicable’ (both appear three times) without reference to how this will be determined.

I agree with this assessment of the positive effects of the NoR.

⁷ Pukekohe Transport Network – Assessment of Ecological Effects September 2023 prepared by Ian Bredin, Sahar Firoozkoohi

6.5.4 Effects on Māori culture, values, and aspirations

Requiring Authority AEE

Section 11.3 of the AEE notes that only Mana Whenua can speak to the impact that a project may have on their cultural values, heritage and aspirations and that the assessment undertaken in the AEE draws on engagement that has been undertaken with Mana Whenua and inputs provided by Mana Whenua representatives during the concept design of each corridor. All Mana Whenua were invited to prepare Cultural Impact Assessments. The AEE notes that a Cultural Values Assessment was received from Ngāti Te Ata Waiohū to inform the options assessment and a CIA from Ngāti Te Ata Waiohū to inform the concept design and AEE.

The AEE also notes that the Pukekohe Transport Network does not directly affect any identified properties or land currently being negotiated under Treaty settlements, land returned under a Treaty settlement, marae, Māori freehold lands, Tupuna Maunga Affected Areas, Tangata Whenua Management Areas, Sites of Significance under the AUP or within the coastal environment under the Marine and Coastal Area (Takutai Moana) Act 2011. The AEE notes that much of the Network is within the Ngāti Tamaoho statutory acknowledgement area, which recognises the association between Ngāti Tamaoho and a particular area and enhances the iwi's ability to participate in specified RMA processes.

The AEE notes that the key matters raised by Mana Whenua relate to impacts on streams and ecology, impacts on tuff rings, hills and landscapes, cultural heritage and sites of cultural significance, growth in rural areas, support for the future transport network, and socioeconomic wellbeing.

The AEE notes that the CIA identifies the potential for adverse impacts on freshwater systems and receiving environments and that the CIA identified opportunities for riparian planting alongside the streams to restore and regenerate the environment and increase wetland areas as part of the Project. Improvement of water quality and the importance of the streams and wetlands mauri were also identified. A preference of bridges instead of culverts to enable fish passage and concerns relating to native bats, lizards, birds and fish was also identified.

While many of these matters are identified as being part of future design stages and regional consent processes, to avoid, remedy or mitigate these potential adverse effects, SGA are proposing several conditions which were collaboratively developed with Mana Whenua. These conditions include inviting Mana Whenua to prepare a Cultural Advisory Report (proposed condition 9), to participate in the development of the Urban and Landscape Design Management Plan (ULDMP) (proposed condition 10), and prior to the start of construction works or enabling works Mana Whenua will be invited to prepare a Cultural Monitoring Plan (proposed condition 15).

Planning Review

It is noted that NoR 2 cuts through the Oira, the Ngaakooroa and the Whangapouri stream catchments which flow into Pahurehure Inlet and ultimately Manukau Harbour.

NoR 2 is not within any 'Sites and Places of significance to Mana Whenua' as identified on the AUP's planning maps. There are no known archaeological sites identified within the NoR area.

No specialist review has occurred as the CIA was not provided however, it is noted that no submissions have been received from Mana Whenua groups or from Heritage NZ Pouhere Taonga (HNZPT) in relation to NoR 2.

6.5.5 Traffic and Transport Effects

Requiring Authority AEE

Effects on traffic and transport are addressed in section 11.4 of the AEE which refers to the Assessment of Transport Effects⁸. The Transport Network Assessment includes a table that outlines the interdependencies between the NoRs, noting that north of NoR 2 (east of and including Sim-SH22 link) could proceed as an interim

⁸ Pukekohe Transport Network – Assessment of Transport Effects , September 202s , prepared by Subha Nair / Deborah Keary / Sharath Kotha

stage, however the southern part (South of NoR 3) would be best implemented with (or after) NoR 3 and NoR 4 to provide suitable connections. The central part of NoR 2 between Sim-SH22 link and NoR 3 is proposed to be staged last in the programme to provide optimum mode shift outcomes.

The AEE's Executive Summary notes that the significant positive operational effects for NoR 2 relate to safety, walking, cycling, general traffic, freight and that there is a minor positive effect in terms of public transport, and a moderate positive effect in terms of property access which is also considered to have some adverse effects that will need to be managed. The positive effect of NoR 2 in terms of freight is considered to have significant regional benefits. The rural freight routes are noted as being critical to connecting local growers to commercial centres and shopping centres. They enable freight delivery trucks without relying on strategic corridors.

The AEE notes that due to the complexity of access arrangements changing over time, it's not currently possible to confirm a precise treatment for all individual accesses, particularly in areas that are transitioning from rural to urban. Therefore, it is proposed for each of the designations to include a condition (proposed condition 13) to demonstrate (in the Outline Plan) how safe access will be provided for each existing access that is altered by the project. The implementation of restricted turning movements such as the inclusion of a raised median or wire rope barrier (left in, left out) from existing accesses are anticipated to be minor, adding a maximum of 1 – 4 minutes to journey times for those making restricted right turn movements.

An assessment of property access has been undertaken to inform the designation boundary and concept design and to assess potential effects. There are limited existing properties that will require direct access given this is largely a new alignment and that its current land use is predominantly rural. There are opportunities to realign access points to surrounding local road such as Runciman Road and Burt Road if required. As the Drury West area develops, the existing property accesses will be re-routed to the appropriate collector road network. Overall, less than 3 properties will be restricted to left-in and left-out vehicle access, where right turns are restricted. Through assessing the re-routing time, it has been determined that the addition journey time is minimal (less than 2 minutes based on the farthest distance) due to the number of roundabouts located along the corridor and it is only for right turn movements.

The AEE also covers construction effects which relate to traffic routing, property access, pedestrian and cyclist safety, road safety, on-street and public parking, parallel construction of projects and land use activities that will require further consideration. It is recommended that a Construction Traffic Management Plan (CTMP) be prepared prior to the start of construction for each stage of the work, this is included as proposed condition 17. The technical report recommends that if required, Site-Specific Traffic Management Plans (SSTMP) should be developed to manage constraints on access to affected properties.

Specialist Review

Wes Edwards' review of the NoR and Pukekohe Transport Network - Assessment of Transport Effects September 2023 (**refer Appendix X**) notes that NoR 2 (referred to as 2:DPL in his assessment) is the most significant of the eight projects, both in terms of the length of the route (10.6km) and in terms of the impact on changing travel patterns in the area. He notes that the form is essentially a two-lane state highway with a median, having a speed limit that ranges from 50km/h in urban sections such as segment 4 where there is rural on one side of the road and urban development on the other, 60km/h or 80km/h in the other segments through rural sections, although speed limits are expected to be subject to change as the design and surround development progress.

The timing of implementation of three of the four segments is identified as being as not before 2035 and potentially not before 2040 although no timing is given for the SH 22 Connection segment. He notes that SH22 Connection could be implemented separately from the remainder of the NoR as land in Drury West is developed to assist in reducing the volume of traffic using Karaka Road (SH22) (Section 8.119 of his review).

Some of the comments from Mr Edwards raise the issue of a potential duplication of facilities such as active mode facilities that are also expected to be provided along Paerata Road Karaka Road (SH22) and he raises a question about the additional width of the NoR 2 corridor being reasonably necessary (Section 8.133 of his review).

The impact on property access along parts of Sim Road, Tuhimata Road and Cape Hill Road is noted and also on local road connections (Section 8.128 of his review). He notes that the impact of the detours related to changes to Tuhimata Road are not explicitly assessed (Section 8.130 of his review).

Changes to property access due to NoR 2 are noted and it is noted that it is expected that direct property access would not be available along this route although most segments of this route are new sections of road with no existing property access. Mr Edwards points out that up to 10 properties may have access restricted to left-in left-out movements, requiring detours for the previous right-turn movements and that the right turn will require roundabouts that are in the case of properties on the southern side of the SH22 Connection segment are 1 km apart that would result in a 2km trip(Section 8.139 of his review). In the case of the Drury-Paerata Segment properties with access between the SH22 Connection Segment roundabout and the NoR 3 roundabouts would have an even longer detour trip due to the distance between the roundabouts (Section 8.140 of his review). He notes that the additional detour length could represent a minimal to moderate increase in the journey length. Mr Edwards notes that he expects the road once it becomes a state highway could become a Limited Access Road (LAR), but those processes would be independent of these NORs. Properties on a LAR can only be accessed through crossing points approved by NZTA under the Government Roading Powers Act 1989.

Mr Edwards has considered the submissions to NoR 2 that related to transport and traffic and the design of the road and roundabouts in sections 11.7-11.41 of his review. He has helpfully identified the submitter locations where they identified a specific site. In almost all of the cases he is unable to support the points raised in the submissions. However, he did note in relation to the Paerata Arterial Segment in response to submissions that request the alignment to be moved, that an option between Sim Road and the railway has not been considered to date and that this might be feasible for some parts of the alignment (sections 11. 28 and 11.29 of his review) and asked for evidence on this matter. He did support the amendments to the conditions relating to the Construction Traffic Management Plan (CTMP) requested by the Ministry of as noted (submission 27) to include the Ministry and schools as a stakeholder, and to add references to educational facilities during pick up and drop off times and to amend the CTMP condition to be consistent with other CTMP conditions adopted for the Warkworth NoR and Airport to Botany NoRs.

Planning Review

The positive operational benefits assessed in the AEE as rising from NoR 2 are related to the delivery of the route. These benefits are related to the reason that Fisher & Paykel Healthcare have provided a submission in support of the NoR, as a nearby landowner looking to develop a research and development and manufacturing campus nearby.

However as it is not clear if the delivery of NoR 2 is to be staged, what the staging is and what benefits will be realised as it appears that for example freight benefits are reliant on the entire route being in place. It would be helpful to understand if the delivery of the stages is expected to be sequenced, and the actual sequence and timing of the delivery of NoR 2 (in full and in terms of the four segments) and the associated benefits. It would be helpful if this breakdown included the construction duration in relation to each stage. The information would assist in relation to two matters:

1. Weight given to the benefits that relies on the programme of work and understanding if nor deliver is to be sequenced whether particular segments are more beneficial than others.
2. Understanding the implications in terms of the 20 year lapse period sought.

The transport benefits for the land immediately adjacent to the NoR 2 route are only really realised for land that is inside the RUB (and even then, not directly as future access will be directed to new local roading within developments)⁹. The benefits for the land in the FUZ are associated with the level of development of the land enabled when the land is rezoned. It is however noted that land abutting Segment 2 as shown in Figure 6-2 below is able to be developed under the current Residential zoned and that this land is subject to Plan Change 78 and as discussed in section 6.9 could be further intensified.

⁹ Section 11.15.1 of the AEE.

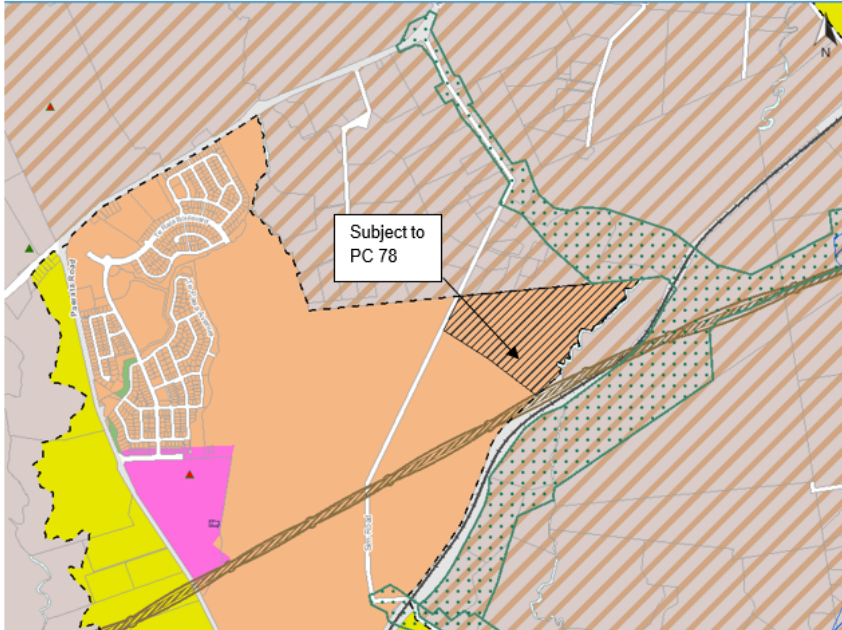


Figure 6-2 the live zoned land adjacent to NoR 2

While the location of NoR 2 on the boundary of the RUB and largely on FUZ land with Rural zoned land on the other side makes sense, a key uncertainty created is how future transport integration is managed for the land outside the RUB. Condition 10 related to the ULDMP as proposed is focused on integration with the adjacent existing or proposed urban context. While there is a clear process for this land to be included in the RUB it does beg the question - should this condition be amended to deal with rural land as well and if not, what approach is proposed to manage this?

It is noted that the Transport assessment is based on the growth anticipated in the Future Urban Land Supply Strategy (FULSS) 2017. The AEE (Section 3.3) notes that at the time of drafting the AEE the draft Future Development Strategy (FDS) had been released and that it was expected to be finalised later in 2023. This has been finalised and it would be beneficial to understand what changes if any have been made in relation to the Project Area and the implications in terms of the timing of projects – given the comments in the AEE.

In addition, it would be helpful to understand if the interrelationship between the NoR and other transport projects (such as the prerequisites as noted in Wes Edwards review) has changed given the change in government and potentially funding as this has a bearing on the lapse period requested.

In terms of the submissions seeking that the NoR is rejected or amended to address the submitters concerns about the option selected and the transport effects, there is nothing following the reviews of the submitted documentation or the assessment of alternatives that suggests that there is a fundamental flaw with the NOR as proposed. However, B and L Postles and other submitters question the selection of this particular route and why Sim Road is being used and wonder why other alternatives were ignored (such as Paerata 5 Farms Limited, B and L Postles and Roding and Asphalt Ltd). Some are asking if the route can be moved closer to the rail corridor (such as PD and RA Berry in Submission 16). The presence and benefit of roundabouts and the benefit of this route for freight is also questioned by JC Thompson in Submission 23.

The Ministry of Education (submission 27) as noted above has submitted in relation to the potential effects of construction traffic from future construction works of the transportation network being delivered through NoR 2 and the other Notices of Requirement on existing schools, or any future schools developed in this area. The Ministry is seeking to changes to conditions to ensure that appropriate conditions are included in the designations to mitigate any adverse effects associated with the construction of the Pukekohe transport network. These changes are discussed in more detail in section below.

It is noted that the closest school to the NoR 2 extent is Wesley College which is accessed from Paerata Road (SH22). It is unlikely that construction traffic will use Jonah Loum Drive and therefore the new Paerata School site is unlikely to be affected. It would be helpful to have any effects on these schools addressed at the hearing. However, it is noted that the former location of the Paerata School (designation 5037) on Tuhimata Road is still shown in the AUP as a school designation and NoR 2 is located under 300m (as the crow flies) from the intersection of Tuhimata Road/Sim and Cape Horn Roads and the works and construction traffic and potential traffic diversions may impact on that site. The Ministry may be able to advise what its plans are for this land.

It would be helpful for the requiring authority to provide a response at the hearing on the matters raised by submitters both in terms of further information and the changes to conditions suggested by submitters and Mr Edwards. I consider that the potential adverse traffic and transport effects can be avoided, remedied, or mitigated, subject to the above, and the proposed conditions as recommended to be amended.

6.5.6 Construction Noise and Vibration Effects

Requiring Authority AEE

Relevant to the discussion about NoR's construction noise and vibration is the approach to the likely receiving environment at the time of construction. In terms of existing receivers, there are existing dwellings within and adjacent to the land subject to NoR 2.

The zones within the NoR are Rural Countryside living, Rural – Mixed Rural Zone and Future Urban Zone. The land adjacent to the route is described in the AEE as currently being Rural Countryside living, Rural – Mixed Rural Zone; Future Urban Zone and Residential – Mixed Housing Urban Zone.

Effects on construction noise and vibration are addressed in section 11.5 of the AEE which refers to the requiring authority's technical report Pukekohe Transport Network - Assessment of Construction Noise and Vibration Effects¹⁰.

Noise levels are assessed in terms of criteria in New Zealand Standard 6803:1999 Acoustics – Construction Noise and measured in terms of the standard. Construction vibration is assessed in terms of vibration criteria developed for the project (referred to as Category A and B – noting that the levels proposed for Auckland Transport's NoR's are based on the AUP-OP and those for Waka Kotahi are based on Waka Kotahi "State Highway Construction and Maintenance Noise and Vibration Guide" (Guide),V1.1, August 2019 with the more stringent amenity criteria for occupied buildings.

Section 4.4 notes that it is expected that the majority of the works which is likely to be more than 20 weeks in duration will be carried out between 7am – 6pm Monday to Saturday. There may be extended hours during summer earthworks season (e.g. 6am to 8pm, Monday to Sunday), there is also the possibility of night works for critical activities (culvert construction and road surfacing).

A list of 39 receivers is provided for NoR 2 where construction noise levels are predicted to exceed 70dB LAeq in Appendix A to the Assessment of Construction Noise and Vibration Effects. It is understood that 70dB LAeq is selected as it is the "long-duration" noise criteria at noise sensitive receivers, and other levels are 85 dB LAFmax during the daytime, 45 dB LAeq during the night-time and 55 dB LAeq during the daytime on Sundays and public holidays.

It is also noted that future receivers constructed within 76m of the works could experience noise levels that exceed the 70 dB LAeq noise criterion during high noise generating activities such as the pavement works, without mitigation implemented.

The assessment notes that the works will be intermittent and that the worst case scenarios are not expected to be frequent but are expected to be mitigated to 70dB LAeq for most construction works. Mitigation in the form of

¹⁰ Prepared by Joshua Dunkel, Siiri Wilkening and Claire Drewery

barriers is noted as being expected to achieve noise level reductions of about 10 decibels. Night works are noted as being the most problematic but it is suggested that this is likely to be limited in duration.

Two buildings are identified as being predicted to have vibration exceeding the Category B criteria without mitigation. The daytime Category A vibration amenity criteria is predicted to be exceeded at 17 buildings and is predicted to be exceeded at future buildings if they are occupied during the works and within 21 m of the roller compactor.

Specialist Review

The review by Rhys Hegley from Hegley Acoustic Consultants notes that the assessment of construction noise effects have little information on the actual predicted level of noise/ vibration with no indication as to the actual level expected by the receiver. He suggests that it would be useful to have more information on the bandwidth used in Table 6-1 of the Assessment of Construction Noise and Vibration Effects. Table 6-1 provides examples of the potential effects on receivers at different noise levels at different bandwidths – up to 90 dB LAeq. He has similar concerns about the limited information about the vibration levels at each building as outlined in Section 3.3 of his memo.

Mr Hegley notes that the use of the Construction Noise and Vibration Management Plan (CNVMP) and Schedules to the CNVMP to address specific construction activities that may arise after the preparation of the CNVMP is a best practice response. In Section 3.2 of his memo, he notes that the reality is that a 10dB reduction from a barrier proposed to control construction noise will be difficult to achieve. He notes the circumstances where the reduction may not be achieved and poses the question if noise barriers that are proposed for operational noise could be built before construction.

He is also concerned at the potential for night works to be used as a means of meeting a construction programme deadline.

He has not seen the need to respond to specific submissions relating to construction effects as they were general in nature.

He has recommended changes to the construction noise and vibration conditions submitted with the NoRs – none of these changes are specific to NoR 2.

Planning Review

Construction phases for each of the Projects as noted in section 4.4 of the Assessment of Construction Noise and Vibration Effects are expected to occur for a minimum of 12 months. The duration of works shown in Table 8-2 of the AEE for NoR 2 is 3 to 4 years. While the management of construction noise through CNVMP is a common requirement for works in the road it is noted that in relation to NoR 2 there are sections of new road and the noise levels are in an environment where the ambient levels are low.

Section 6.2.2.1 of the Assessment of Construction Noise and Vibration Effects notes that 491 Sim Road is identified as the site where the noise levels from works even with mitigation will be over 85dBLAeq and the majority of existing receivers will receive around 70 to 75 dB LAeq. The assessment also suggests that the existing receivers in the FUZ may not be there in the future and that future receivers will need to be at least 76m away to be likely to be receiving noise levels less than 70dBLAeq.

A number of submitters have raised concern about the impact of construction noise on their amenity and J Ruddell (Submission 9) has identified concern about the impact of noise on the operation on his horse business. The McKean Family Trust (Submission 25) seeks changes to the construction noise conditions proposed to address residential amenity and commercial interest due to potential to have temporary (construction) effects.

Having more information about the noise levels predicted for the specific sites and the duration of the works could be helpful in terms of determining the adequacy of the conditions as proposed. It is also noted that there is an area of Residential – Mixed Housing Urban Zone land close to SH22 Connection segment between Sim Road and the rail corridor. This land is subject to Plan Change 78 and the zoning may change to a more intensive zoning. It is not clear if noise effects from construction of the new road connection in this location given this is 'live zoned' land has been adequately considered in this context.

The Ministry of Education (submission 27) is also concerned about noise effects of construction on existing schools, or any future schools developed in this area. The two existing Ministry of Education sites closest to the NoR 2 designation extent are the one at Jonah Lomu Drive (around 1.5 km as the crow flies from both Segments 2 and 3) and the one at Tuhimata Road. Wesley College is also close to NoR 2 (around 1km as the crow flies from Segment 3.) It would be useful to have feedback from the requiring authority on any potential noise effects from construction of the new road connection on these sites.

Changes to conditions to ensure that appropriate conditions are included in the designations to mitigate any adverse noise effects associated with the construction of the Pukekohe transport network are discussed in more detail in section 6.7.13 below.

It would be helpful for the requiring authority to provide a response at the hearing on the matters raised by submitters and by Mr Hegley as it is not clear at this time that the potential adverse construction noise effects in particular can be avoided, remedied, or mitigated.

6.5.7 Operational Noise and Vibration Effects

Requiring authority AEE

Operational Noise Effects are addressed in section 11.6 of the AEE and in the Assessment of Operational Noise Effects¹¹ appended to the AEE.

Table 11-1 in section 11.6.1 of the AEE notes that there are 5 existing Protected Premises and Facilities (PPFs) on altered roads and 59 along the new road. Section 11.6.2 notes that NoR 2 is in an area currently relatively unaffected by traffic noise. It also notes that 13 of 61 existing Protected Premises and Facilities (PPFs) are predicted to receive noise levels in Category B and two PPFs in Category C, without mitigation.

As set out in Table 4-1 of the Assessment of Operational Noise Effects, 375 Burt Road, 301A and B Cape Hill Road, 11 Crown Road, 1238, 1242 Great South Road, 21,22 Ngakoroa Road, 777, 785, 787, 791,792 Runciman Road, 77, 319 B-E, and 412 Sim Road were not assessed as the buildings are inside the designation.

The discussion for NoR 2 in section 11.6.3 of the AEE is that as low noise road surfaces are part of the base design, mitigation in the form of barriers was assessed. The Pukekohe Transport Network - Assessment of Operational Noise Effects in section 6.2.3 notes in relation to NoR 2 that mitigation may take the form of barriers (where they are effective).

The AEE notes that prior to construction, mitigation measures will be reassessed to confirm the best practicable option for the PPFs that are predicted to receive noise levels above Category A.

Specialist Review

The review by Rhys Hegley from Hegley Acoustic Consultants of the Assessment of Operational Noise Effects covers a range of matters. He points out that there is a difference in approach between the construction noise assessment and the operational noise assessment in terms of dwellings built between the time of designation construction. The rationale is due to the definition of PPF in NZS 6806: 2010 Acoustics - Road-traffic noise - New and altered roads (NZS 6086). He points out that the low noise road surface alone may not achieve a reasonable level of noise for these future dwellings and that while there is logic to leave it to those developing the future dwellings to incorporate their own mitigation there is no method by which those building houses prior to the road's construction can determine the noise the house would be exposed to.

He notes two methods to address this. Either to amend the definition of PPF to include that that arrive up until the final design is done or require future developers to provide the mitigation with the noise levels provided for either in the AUP or in the designation conditions (currently the existing PPF are shown in the conditions). He recommends including an amended PPF definition in the conditions.

¹¹ Prepare by Joshua Dunkel / Siiri Wilkening / Shivam Jakhu/ Vitalii Zaiets dated September 2023

He points out that the approach to operational road noise mitigation for all future PPFs, whether they are built between designation and construction or as part of some future development, is to share the burden of mitigation between themselves and the adjacent landowner. He suggests that barrier mitigation has the potential to be effective at controlling road traffic noise, particularly to the as yet undeveloped Future Urban Zone (FUZ) and that Waka Kotahi as the requiring authority should meet the cost of this. He points out that while barriers are not precluded in the current conditions they are not encouraged and recommends the form of a condition to this effect.

Mr Hegley also outlines the need for certainty in relation to the noise level that PPFs could experience in the conditions.

He supports condition 26 in relation to the road surface. But also notes that the various roads would in fact be constructed with a noisier chip seal and that sometime within 12 months of opening the road would be resealed with a low noise road surface. He suggests that the conditions allow such elevated levels for 12 months but notes that elevated must increase the risk of disturbance to neighbours, particularly those exposed to the higher levels.

He summarises the range of predicted noise levels in relation to NoR 2 as :

- Altered road 49-64 dB $L_{Aeq(24\text{ hr})}$
- New Road 42-64 dB $L_{Aeq(24\text{ hr})}$

He points out that some PPF will receive predicted noise levels at the upper end above 55 dB $L_{Aeq(24\text{ hr})}$ and that there are undesirable levels of noise on some PPF that are an adverse effect. He notes that the Assessment of Operational Noise Effects points out that it is not possible for the road to internalise its effects meaning after implementing the Best Practicable Option (BPO), the effects remain and a shared response to mitigation is important.

Operational vibration is not considered an issue and he has not seen the need to respond to specific submissions relating to operational effects as they were general in nature.

Planning Review

NoR 2 is a mix of altered road and new road and the environment it travels is not just FUZ and Rural as noted in the Assessment of Operational Noise Effects. There is Residential – Mixed Housing Urban Zone land abutting the SH22 Connection segment (between Sim Road and the rail corridor) that is subject to Plan Change 78. It is not clear if noise effects from the operation of the new road connection in this 'live zoned' land has been adequately considered in this context given the comment in Section 5.1 of the Pukekohe Transport Network - Assessment of Operational Noise Effects that existing residential zoning is only relevant to NoR 6. It would be helpful to have confirmation if effects on this live zoned have been considered and what type of mitigation could be used in this location where the new road is going to be constructed over the rail corridor.

The AEE notes that the majority of PPFs are predicted to receive noise levels in Category A (47 of the total 61), 14 PPFs are still predicted to receive noise levels in Category B, after mitigation. Section 6.2.3 of the Assessment of Operational Noise Effects has different numbers of PPF affected. It would be helpful in relation to the difference between the AEE and the Assessment of Operational Noise Effects in relation to the numbers of PPF affected to have the discrepancy addressed. However, it is noted this could be addressed if changes to the definition of PPF in the conditions captured those new PPF between designation and construction especially on the Residential – Mixed Housing Urban Zone land.

An understanding of the likely location of permanent noise barriers where the low noise road surface is expected to be insufficient would be helpful as these may also have visual effects that need to be considered.

A number of submitters have raised concern about the impact of operational noise on their amenity and J Ruddell (Submission 9) has also identified concern about the impact of noise on the operation on his horse business. The McKean Family Trust (Submission 25) seeks changes to the noise conditions proposed to address residential amenity and commercial interest due to potential to have temporary (construction) effects.

More information of the impact of the increase in noise from the new road close to the Residential – Mixed Housing Urban Zone land close to SH22 Connection segment between Sim Road and the rail corridor would

also be helpful as it is not clear that this has been assessed. It would be useful to understand if there are operational noise effects likely from the works on the three school sites (Wesley College, Paerata School on Jonah Lomu Drive and the former Paerata School site at Tuhimata Road).

It would be helpful for the requiring authority to provide a response at the hearing on the matters raised by submitters and the changes to conditions outlined by Mr Hegley and the McKean Family Trust as it is not clear at this time that the potential adverse operational effects in particular can be avoided, remedied, or mitigated.

6.5.8 Construction Flood Hazard Effects

Requiring authority AEE

Section 11.7 of the AEE discusses the approach to potential flood hazard risks and the flood model relied on as being based on 2.1 degrees of warming and a 16% increase in rainfall based on AC Guidance and MfE and a more severe climate change scenario allows for 3.8 degrees of warming and a 32.7% increase in rainfall.

The AEE notes that there may be flood hazard effects during the construction phase and describes in Section 11.7.1 the types of hazards that may occur as a result of specific construction activities. These activities and/ or the effect include:

- Disrupting natural drainage patterns with removal of vegetation;
- Changes to existing stream crossings / new stream crossings;
- New attenuation wetlands or upgrading of existing attenuation wetlands;
- Blocking overland flow paths or altering overland flow paths due to construction related activities (laydown and construction areas and recontouring).

The AEE notes that the works are expected to be able to be undertaken in a way that will appropriately manage the risk, and this can be defined through flood risk mitigation measures that are included in the Construction Environmental Management Plan (CEMP) provided for in the designation conditions offered.

Section 11.7.6 of the AEE concludes that flood hazard risks during construction can be adequately managed. Proposed works will be located outside of flood plains and overland flow paths as far as practicable. Where this is not possible, potential flooding effects will be managed through the flood risk mitigation measures set out in the CEMP for existing high flood hazard areas through measures proposed in 11.7.2 such as:

- Siting construction yards and stockpiles with minimal effects on flood flows;
- Methods to reduce the conveyance of materials and plant that is considered necessary to be stored or sited within the flood plain (e.g. actions to take in response to the warning of heavy rainfall events);
- Staging and programming to carry out work when there is less risk of high flow events;
- Diverting overland flow paths away or through areas of work;
- Minimizing the physical obstruction to flood flows at the road sag point.

Specialist Review

Trent Sunich, the council's Consultant Stormwater Technical Specialist has reviewed the NoR and provided a response which is included in Attachment 3.

He notes that due to the dynamic nature of construction staging it is not typical practice to assess potential flood hazard in the manner undertaken for the permanent operational phase. He points out that a requirement has been included in the NoR conditions for flood hazard assessment during construction (and associated mitigation) as part of the Construction Environmental Management Plan (CEMP). He considers that this proposed approach is satisfactory to assess and or mitigate any temporary flood hazard effects associated with the construction activities. He makes no suggestions in terms of changes to the CEMP conditions.

Planning Review

It is noted that none of the submitters raised concern about flood effects and that the impact of earthworks on flood risk will be considered as part of the regional consent process. Therefore, based on the comments from Mr Sunich I consider that the potential adverse effects on flooding during construction can be avoided, remedied, or mitigated, subject to the above, as the CEMP condition requirement for flood hazard to be assessed during

construction and the requirements of the regional consent provisions in the AUP will ensure that this effect is adequately addressed.

6.5.9 Operational Flood Hazard Effects

Requiring authority AEE

Section 11.7.3 notes that operational effects have been assessed through flood modelling to consider the flooding extents at culvert crossings, bridge structure and areas where the new road embankment is within an existing flood plain or major overland flow paths. The assessment also considers the extents of flooding on existing properties due to the proposed projects. A 2.1 degree (2.1°C) and 3.8 degree (3.8°C) climate change scenario.

Flood hazard risk resulting from the Pukekohe Transport Network as a whole are identified as being the following possible changes to:

- The flood freeboard to existing habitable buildings;
- Overland flow paths and flood prone areas;
- Flood levels on urban land and developable land (in the FUZ);
- The ability to access property by residents and emergency vehicles.

Table 11-2 of the AEE summarises the effect and proposed mitigation for Specific Operational Flood Hazards (from the 100 year ARI flood with a 2.1°C and 3.8°C climate change adjustment to rainfall) of NoR 2 follows :

NoR 2 crosses 8 overland flow paths and includes some floodplain displacement around the Drury South Connection segment. There is a mostly a negligible flood risk due to the mostly uninhabited land upstream of flowpath crossings.

A moderate existing and future risk was identified at the existing dwellings at:

- 767 Runciman Road
- 763B Runciman Road

The effects of using a 3.8° climate change adjusted rainfall pattern compared to the 2.1° climate change pattern shows deeper flood depths in all eight flowpath crossings for the NoR 2 road alignment.

The changes in flood depth are relatively small with the change range of 0.09m to 0.32m.

The proposed mitigation is :

- Appropriately size culverts and bridges;
- No attenuation in wetlands in the lower half of the Ngakoroa and Oira Streams;
- Attenuation for the 10yr and 100yr where wetlands are located in the upper half of the Ngakoroa and Oira Streams;
- Attenuation in wetlands located within the Whangapouri Stream catchment;
- Provide diversion channels at the toe of fill embankments to prevent ponding;
- Offset the flood volume displaced by filling in the floodplain with an equivalent volume of excavation within the floodplain;
- Maintain 1200mm freeboard to new bridge soffits using the 100-year ARI flood level with 3.8° Climate change hydrology.

A Flood Hazard condition is proposed which will require the future detailed design of the transport corridors to be designed to achieve specific flood risk outcomes. This includes flood modelling of the pre-Project and post-Project 100 year ARI flood levels (for Maximum Probable Development land use and including climate change). The AEE notes that future detailed design of the alignments will be subject to a separate detailed flood hazard assessment which will refine the design of formations, culverts, bridge crossings and location / size of treatment (attenuation, water quality or both). It also notes that regional stormwater consents will also be required closer to the time of construction.

The AEE proposes that the project (i.e all of the NoR's) be designed to achieve the following flood hazard outcomes:

- No increase in flood levels in a 1% AEP event for existing authorised habitable floors that are already subject to flooding or have a freeboard less than 150mm;
- No more than a 10% reduction in freeboard in a 1% AEP event for existing authorised habitable floors with a freeboard of over 150mm;
- No increase in 1% AEP flood levels for existing authorised community, commercial, industrial and network utility building floors that are already subject to flooding;
- No more than a 10% reduction in freeboard in a 1% AEP event for existing authorised community, commercial, industrial and network utility building floors;
- No increase of more than 50mm in flood level in a 1% AEP event on land zoned for urban or future urban development where there is no existing dwelling;
- No new flood prone areas (with a flood prone area defined as a potential ponding area that relies on a single culvert for drainage and does not have an overland flow path);
- No more than a 10% average increase of flood hazard (defined as flow depth times velocity) for main access to authorised habitable dwellings existing at time the Outline Plan is submitted. The assessment shall be undertaken for the 50%, 20%, 10% and 1% AEP rainfall events.
- Compliance shall be demonstrated in the Outline Plan, which shall include flood modelling of the pre-Project and post-Project 10% and 1% AEP flood levels (for Maximum Probable Development land use and including climate change);
- Where the above outcomes can be achieved through alternative measures outside of the designation such as flood stop banks, flood walls, raising existing authorised habitable floor level and new overland flow paths or varied through agreement with the relevant landowner, the Outline Plan shall include confirmation that any necessary landowner and statutory approvals have been obtained for that work or alternative outcome.

The AEE concludes in section 11.7.6 that there are potential operational effects risks of increased flood levels upstream and downstream of crossings and where the vertical alignment of the road is elevated. The conclusion is that flood hazard effects can be appropriately managed through the potential management and mitigation measures provided at the future detailed design stage within section 11.7.5 of the AEE that are included as conditions on all of the NoRs.

Specialist Review

Trent Sunich, the council's Consultant Stormwater Technical Specialist has reviewed the NoR and provided a response which is included in Attachment 3.

He notes that the technical assessment has taken that the role at this time is to identify the designation area is sufficient to provide for the alignment construction and operation and any associated works for flood mitigation techniques and that on balance he agrees with the approach. He considers the use of the risk criteria sufficient to identify the quantum of effect that current exists for various properties (particularly in relation to moderate and high-risk areas), and correspondingly that will exist in the future when detailed design is completed via the proposed conditions of the Outline Plan process. He notes that the detailed design process will also capture flood hazard that has not been identified in the flood hazard report but may eventuate as a result of matters such as land use change over the coming decades. Notwithstanding this, he has made various comments in relation to the proposed conditions later in this report.

During pre-lodgement discussions, he notes that he queried whether sensitivity analysis should be completed for a further conservative climate change scenario noting the lapse period for constructing the NoRs is up to 20 years and agrees with the response that additional sensitivity assessments should be undertaken at the resource consent stage especially as flood hazard prediction will continue to evolve. He notes that the proposed NoR conditions need to be sufficiently flexible to accommodate a range of model sensitivity scenarios using the best information available at that time (including more conservative climate change scenarios, if that eventuates). To assist he has recommended edits to the NoR conditions.

Planning Review

There is nothing to suggest that the extent of the designation is not sufficient to provide for the alignment construction and operation and any associated works for flood mitigation techniques however given that this is a changing space it is assumed that Waka Kotahi will prior to the Outline Plan stage review the effects of climate change in terms of the best information available at that time.

It is noted that none of the submitters raised concern about flood effects. Therefore, it would be helpful for the requiring authority to provide a response at the hearing on changes to conditions suggested by Mr Sunich. I consider that subject to the above, and the proposed conditions as recommended to be amended the potential adverse effects on flooding can be avoided, remedied, or mitigated.

6.5.10 Terrestrial Ecological Effects

Requiring authority AEE

Section 11.8 of the AEE assesses the potential ecological effects based on the Pukekohe Transport Network – Assessment of Ecological Effects¹² that are the subject of district plan controls under the relevant statutory documents and notes that ecological effects that relate to regional plan and / or NES matters will be assessed, mitigation proposed and consented if appropriate through future processes.

The AEE does however point out the positive effects accruing from the proposed Pukekohe Transport Network:

- Improved blue/green infrastructure, such as stormwater wetlands, swales, and associated landscaping (which will include indigenous vegetation) will provide a wide range of ecosystem services;
- Planting on berms, embankments, and stormwater wetlands are connected and
- Integrated with retained forest remnants and mature trees, streams, riparian margins, and open space zones.
- Proposed bat mitigation in association with the landscape planting of berms, embankments, and stormwater wetlands is likely to improve ecological connectivity for other native fauna.

Construction related effects are discussed in section 11.8.2 and are described as:

- Disturbance and displacement of roosts / nests and individual (existing) long-tailed bats, avifauna and herpetofauna due to construction activities (noise, light, dust etc that will occur after vegetation clearance (subject to regional consent controls);
- Effects relating to the removal of trees protected as an Auckland district planning matter which is covered under arboricultural effects but is considered low from an ecological perspective

The level of disturbance in the case of NoR 2 of disturbance and displacement to roosts and individual bats (existing) assessed before mitigations is considered to be moderate. Section 11.8.3 of the AEE notes that mitigation in the form of pre-construction ecological surveys and Ecological Management Plans (EMP) that include a Bat Management Plan (BMP) are proposed in places where moderate or higher effects are identified. It is noted that the term Bat Management Plan is not used in the condition 23 as submitted related to Ecological Management Plan.

The effect with mitigation is considered to be low.

It is noted in the AEE that there are a number of Threatened and At-Risk (TAR) bird species and non-TAR bird species likely to be present within the project area and the effect of disturbance and displacement to TAR and native birds, and nest sites, resulting from construction activities is pre mitigation assessed as moderate. An Avifauna Management Plan (AMP) for all TAR birds is recommended as a condition on the proposed

¹² Prepared by Ian Bredin and Sahar Firoozkoohi dated September 2023

designation and the assessment is that with this mitigation in place the effect on TAR bird species will be very low. It is noted that the term Avifauna Management Plan is not used in the conditions submitted.

The AEE notes that only two TAR species of skinks are likely to occur within the project area (copper skinks and ornate skinks). The ecological value of both skinks was assessed as high (At Risk-Declining species), and the magnitude of effects were assessed as negligible in the Auckland Region due to the skinks being considered habitat generalists. The effect due to construction was assessed as low and there was no mitigation proposed for NoR 2.

Operational effects were considered in section 11.8.4 of the AEE. They are considered to be related to:

- Loss in connectivity for indigenous fauna, in particular bats, birds, lizards, associated with light, noise and vibration effects from the operation of the road, leading to fragmentation of habitat; and
- Disturbance and displacement of indigenous fauna and their nests / roosts, in particular bats, birds, herpetofauna, associated with light, noise and vibration effects from the operation of the road.

The level of effect (pre – mitigation) on long -tailed bats for NoR 2 is described in Table 11-5 as being moderate and after implementation of the proposed mitigation (a BMP) the effect is considered low.

The level of disturbance and displacement of TAR and native birds, and nest sites due to light, noise, and vibration effects from the operation of the road is assessed as moderate and after implementation of the proposed mitigation (an AMP) the effect is considered low.

The loss of connectivity for native herpetofauna species through the presence of the road and associated disturbance such as operational noise, vibration, and light is identified in section 11.8.4.3 as potentially leading to an overall reduction in size and quality of suitable habitat for TAR skinks within the broader landscape. However, the overall level of effect due to operational disturbance is assessed as low prior to mitigation, therefore, mitigation is not proposed.

Specialist Review

Simon Chapman (Auckland Council Consultant Ecologist, Ecology New Zealand Limited) has reviewed the NoR and provided in Attachment 3.

The response does not raise any concerns with the assessment undertaken or the mitigation proposed. However, he did note that the majority of the assessment was undertaken prior to the introduction of the National Policy Statement – Indigenous Biodiversity (NPS:IB) and that additional considerations in line with NPS are warranted.

Planning Review

It is noted that one of the submitters raised concern about ecological effects. Madeline Robb (submission 7) was worked about the impact of NoR 2 on habitats and ecosystems and would like a redwood tree and bat habitats on 319E Sim Road preserved. The Redwood tree is discussed below in Section 6.7.13. It is noted that Condition 22 requires a survey to determine whether the species of value within the Identified Biodiversity Areas recorded in the Identified Biodiversity Area Schedule that is part of the NoR 2 Form 18 submitted are still present. It appears that part of 319E Sim Road is identified as an area where bats are likely however it would be helpful for the requiring authority to confirm this. If the site is within the Identified Biodiversity Area and a survey prior to construction confirms the presence, then the Ecological Management Plan requirement in Condition 23 is triggered.

Another submitter P Haddad has suggested that the impact of air and noise pollution on ecosystems has not been considered. It is clear from a review of the Pukekohe Transport Network – Assessment of Ecological Effects that noise and vibration and dust effects of the ecosystems during construction and that noise and lighting effects have also been considered. It is not clear if other air pollution effects have been considered. It would be helpful for the requiring authority to confirm this.

Given the comments made by Mr Chapman about the need to address the NPS- IB it would be helpful for the requiring authority to provide a response at the hearing on changes to conditions suggested. I consider that the

potential adverse effects on ecology can be avoided, remedied, or mitigated, subject to the above, and the proposed conditions as recommended to be amended.

6.5.11 Landscape and Visual Effects and Urban Design Evaluation

Requiring authority AEE

Sections 9.4 -9.7 of the AEE, in the description of the receiving environment for each of the four segments of NoR 2, notes that there are no known landscape overlays within the alignment or setting of NoR 2.

Section 11.9 of the AEE discusses Landscape and Visual Amenity Effects and relies on the Assessment report submitted.

Positive effects are identified from the provision of new and upgraded roads both within the existing urban and rural environment, and within the FUZ as including:

- Enhanced connectivity for Pukekohe and Paerata as a whole by integrating with the existing local street network and improving road user safety. It will also improve transport network connectivity to the adjacent landscape outside of Pukekohe;
- Potential for stormwater wetlands to become attractive focal points through considered planting and wetland construction, and for stormwater wetlands to be integrated with active transport routes;
- Landscape mitigation planting will be provided to create attractive environments, which can enhance the built character of their surroundings and positively contribute to the visual quality of the streets and the area's sense of place;
- Opportunity to highlight cultural narratives in the landscape;
- The reduction in speed limits along upgraded alignments of existing roads both within the rural environment and the FUZ will improve the experiential qualities of the corridor for both road users and adjacent properties;
- Integration of active travel routes and recreational paths with Pukekohe's 'green network' of bush and vegetated riparian margins.

These positive effects are not specific to NoR 2.

Construction and operational effects are outlined in Section 11.9.2 of the AEE for all the projects and the specific effects for each NoR. In the case of NoR 2 they are broken down in Section 11.9.4.2 by segment and are outlined (with some paraphrasing) below:

Segment	Construction Effects	Operational effects
<p>South Drury Connection (new road connection is within the existing rural environment and along the southern edge of the FUZ.)</p>	<p>Landscape character effects resulting from the construction the segment are anticipated to be low-moderate due to limited vegetation removal and earthworks.</p> <p>A bridge will span the Ngakoroa Stream which will assist in retaining its natural alignment and pattern.</p> <p>Roading, overhead electrical (transmission) and rail infrastructure are notable components of the segment. The proposed designation largely follows the alignment of the overhead transmission line.</p> <p>The addition of a roading corridor into the landscape, will not be inconsistent with the existing and anticipated landscape character of the area.</p> <p>Rural residential properties along the alignment predominantly include established planting within the</p>	<p>The segment will permanently change the landscape character of the rurally zoned land as introduces a road into established rural and rural residential land use and landscape patterns.</p> <p>Its alignment is proximate to the area identified as FUZ where the existing environment will change to an urbanised environment under the Mixed Housing Suburban (MHS) zone.</p> <p>There will be considerable landform modification required, however, this can be mitigated through the recommendations outlined within Section 11.10.6 of the AEE. Overall, any landscape character effects associated with this segment are low – moderate, post</p>

Segment	Construction Effects	Operational effects
	<p>curtilage that will provide partial screening of the construction.</p> <p>Some properties have limited or no vegetation resulting in likely direct and prolonged views of the construction works throughout the construction period. Overall, for those properties immediately adjacent to the alignment, the designation will likely result in moderate – high temporary effects on visual amenity due to limited screening. Views from public locations will likely be restricted to motorists travelling along Great South Road, Burt Road and Runciman Road and the proposed works will be seen within a transient context. For properties within the localised and wider setting, and from public viewpoints, this segment of NoR 2 will likely result in low effects on visual amenity.</p>	<p>implementation of mitigation measures.</p> <p>The alignment spans close to rural properties predominantly accessed off Great South Road, Runciman Road and Burt Road, resulting in moderate – high visual amenity effects, reducing to low – moderate given the proximity to urban areas and implementation of mitigation measures.</p> <p>Where the alignment spans through the southern part of the FUZ land, the new road will be seen in the context of this emerging urban environment and also the existing overhead transmission lines.</p> <p>There are a number of properties (between Runciman Road and Burt Road) which will have visibility of the proposal, albeit with partial screening within the intervening landscape. Potential visual effects from these locations are assessed to be moderate reducing to low with the implementation of the mitigation.</p>
<p>SH22 Connection (an urban arterial road into this location and permanently change the character of this landscape which has existing rural characteristics)</p>	<p>low- moderate temporary effects on the rural landscape character during construction as substantial earthworks are anticipated to make-up levels to establish a bridge / crossing to span both Oira Creek and the NIMT rail line. The bridge proposed to span Oira Creek will assist in retaining the natural alignment and pattern of the stream (and its enclosing floodplain) will remain. It is anticipated that the alignment will result in low temporary effects on the streetscape character of Sim Road during construction. As Sim Road is existing, it is anticipated that only minimal earthworks will be required.</p> <p>The segment will likely result in low – moderate temporary effects on visual amenity on the retained local properties.</p> <p>Effects on views from public viewpoints, the designation will likely result in low effects on visual amenity.</p> <p>For properties along Sim Road, it is anticipated that front-of-lot boundary planting may be removed with views</p>	<p>The new arterial road follows logical alignment of the topography and includes bridges across the streams and NIMT route which ensures the natural alignment and patterns are not affected and reduces potential adverse effects.</p> <p>Upgrades to the existing Sim Road limits the introduction of new roading in this environment. Overall, the landscape character effects are assessed to be low.</p> <p>The alignment is through properties predominantly accessed off Sim Road and Karaka Road which will remain in the rural environment. There are also houses set back from the alignment (accessed from Sim Road and Karaka Road) which will have views of the work. Some views are partially screened. From public locations along Sim Road and SH22 and users of the NIMT rail line the proposal will be seen within a transient context. With mitigation</p>

Segment	Construction Effects	Operational effects
	<p>of the proposed construction works and activities has a result.</p> <p>Where visible, the upgrade of Sim Road will be seen within the context of an existing road corridor, however in contrast, the southern part of the alignment will introduce new infrastructure (roading, bridge and associated earthworks) into the rural environment.</p>	<p>measures visual effects will be low. There will also be improved visual amenity and user experience associated with the streetscape design, street trees, berm planting and active modes enabled along the route.</p>
<p>Drury – Paerata Link (new road within the rural environment, connecting the two FUZ areas north in Drury and south in Paerata).</p>	<p>The temporary effects on landscape character resulting from construction are anticipated to be moderate. The northern section is located on gently rolling topography, and it is anticipated that earthworks will be limited. In contrast, the central and southern sections are located on more undulating landform, and it is anticipated that more significant cut / fill works will be required. Effects will be localised, with the broader topographic pattern remaining unchanged (beyond the designation boundary).</p> <p>The alignment broadly follows overhead transmission lines to the north and the alignment of the NIMT rail line to the south. Whilst the alignment includes a new road within the rural environment, its alignment is consistent with existing patterns of infrastructure within the landscape fabric.</p> <p>Rural residential properties and farmsteads along the alignment generally have open boundaries, with occasional sporadic and sparse planting. For properties adjacent to the alignment, the proposed construction works and activities will be visible with direct and prolonged views screened by intermittent planting, resulting in moderate-high temporary effects on visual amenity. It is anticipated temporary effects on visual amenity from properties within the wider setting, and from public viewpoints will be low.</p>	<p>A new road will be introduced into this location and permanently change the landscape character which aligns generally adjacent to the NIMT rail line.</p> <p>It is anticipated that the proposal will integrate into the surrounding landscape through the cut / fill proposed response and as it spans a bridge over the Oira Creek which retains its natural alignment.</p> <p>This landscape has existing rural characteristics. The effects on landscape character are assessed to be low – moderate.</p> <p>The properties are predominantly accessed off Sim Road (south) will have views of the alignment however; some views are partially screened by topography and vegetation. Overall, the adverse visual effects from the properties adjacent to the alignment will be moderate, reducing to low with the mitigation measures implemented including screening planting, minimising earthworks, integrating into the surrounding topography and the design of the streetscape.</p>
<p>Paerata Arterial (the upgrade of part of Sim Road (south) and Cape Hill Road, and a new road within the future FUZ)</p>	<p>The effects on landscape character are anticipated to be moderate and temporary. The northern part of this alignment is for the upgrade of three existing roads and will be focussed along the western side of the corridors, where topography is generally more consistent with the existing road level and offset from rural residential properties. It is anticipated that the new road alignment in the southern part of the designation will require earthworks to make-up levels on the descent from</p>	<p>The work will change the character of the area and the composition of the existing road. When considering the alignment proximate to the identified FUZ land, the new road will form part of that emerging urban environment. Along its eastern side there are minimal cut and fill requirements which minimises disturbance to the existing topography. Where vegetation is to be removed along the</p>

Segment	Construction Effects	Operational effects
	<p>the northern edge of the Pukekohe North tuff ring to tie-in to NoR 4 Pukekohe Northeast Arterial.</p> <p>Rural residential properties and farmsteads along the alignment generally have open boundaries / frontages with the existing road corridor, with the exception of more regular screening / hedgerow planting along the central parts of Sim Road. For properties adjacent to the alignment the proposed construction works and activities will be visible with direct and prolonged views of the construction works, resulting in moderate-high temporary effects on visual amenity. Views from public locations will likely be restricted to motorists travelling along the road corridors. From these locations, the proposed works will be seen within a transient context, resulting in low-moderate effects on visual amenity</p>	<p>alignment (especially proximate to the SEA) this should be offset by additional planting in this area. Overall, the proposed designation will result in low-moderate adverse effects on landscape character, reducing to low with the implementation of the mitigation measures.</p> <p>The alignment presents new sections of roading but also the upgrade of roads which are predominantly located upon ridgelines. As such these roads will have high visibility from both the localised context and from adjacent properties. From within the visual catchment to the east there are a number of existing rural residential properties. Views from these locations will be partially restricted by intervening existing vegetation and topography. This project will form an anticipated element of the landscape in the context of the emerging urban environment in relation to the FUZ. The visual amenity effects are therefore, anticipated to be low. The new sections of road will provide for viewing opportunities of the Te Māunu a Tūmatauenga pā, to the east of the designation, resulting in positive visual amenity effects, especially considering the addition of active transport modes This pā sits upon a natural bluff and landform and is identified as an ONL within the AUP.</p>

Overall, the assessment is that anticipated effects for the construction of NoR 2 on Landscape Character will be low to moderate, and low to moderate-high on visual amenity and there will also be positive effects related to the provision of mode share.

An Urban Design Evaluation (UDE) is included with the NoR package and is discussed in section 11.15 of the AEE. As noted in the AEE the UDE provides urban design commentary on the concept designs that should be considered in future design stages through the implementation of the Urban Landscape and Design and Management Plan (ULDMP) included as a condition on the proposed designations. The UDE is supported by a Design Framework with principles as explained in the AEE that seek that transport corridors contribute positively to existing and new communities, the environment and the social and economic vitality of Auckland.

The AEE notes that the urban design opportunities identified could be considered by AT, Waka Kotahi or other parties at future stages of design and development but are not required to mitigate effects of the projects.

Specialist Review

Rebecca Skidmore has reviewed the NoR and provided a response which is included in Attachment 3. She notes that the NoRs are supported by robust urban design and landscape analysis. In section 5.6 of her review, she considers that the context of NoR 2 is clearly described in both the UDE and the LVEA.

She has considered each of the segments of NoR 2 in paragraphs 5.6- 5.11 and notes:

- A large area of earthworks may be required in the vicinity of Ngakoroa Stream and at the intersections with Runciman Road and Burt Road in the Drury South Connection segment. She considers the requirements for the UDLMP are adequate to ensure a suitable design response. She also considers the final road design will not create integration issues for future development although particular care will be required to ensure a suitable interface is achieved in relation to the FUZ land to the north of the alignment.
- SH22 Connection has a very wide corridor in the vicinity of Oira Creek and the crossing of the NIMT rail line. The space within the designation will also provide space to enable mitigation works in relation to the Oira Creek environment. Given the likely continued rural zoning of the corridor and surrounding land, this will not create issues around integrating with future adjacent land-use.
- Drury – Paerata Link passes through land that will likely remain in rural use and is adjacent to and parallel with the NIMT rail line designation. She points out that the final street design may result in redundant land between the two corridors and further consideration should be given to how this land would be accessed and used.
- The Paerata Arterial segment will create the edge to the future urban environment immediately to the west. She notes that the northern portion of the designation will involve upgrading of existing streets with the southern portion comprising a new road alignment and notes that plans are well advanced for a new railway station (the Paerata Station) to the north with likely future zoning accommodating urban intensity housing (THAB zone) transitioning to lower density housing (MHU). She notes that ensuring an appropriate urban interface will be critical when the road corridor is designed and that requirements for extensive cut and fill, will present challenges to achieving a positive street interface.

She also notes that the proposed ULDMP requirements includes Clause (g)(D) “architectural and landscape treatment of noise barriers”, and that further analysis of the landscape effects resulting from such structures should be set out in evidence.

The relevant submissions were also considered by Ms Skidmore and she has requested additional information in relation to the following matters raised in the submissions:

- Landscape and visual effects during construction and after development experienced from 826 Runciman Road. in relation to both NoR 1 and NoR 2
- The loss of vegetation and light effects in the rural environment.
- How the integration with the Paerata train station project will be achieved
- It is suggested that condition 10 that requires the preparation of a ULDMP prior to the start of construction for a stage of work does not convey the specificity of recommendations made in both the UDE and the LVEA and amendments are suggested that sets out requirements for a Land Use Integration Process (LIP) which is absent in relation to the Waka Kotahi NoR condition set.

Planning Review

The effects assessment is predicated on the basis that there is going to be change in relation to the FUZ zoned land from a rural to an urbanised environment. The issues raised in Rebecca Skidmore’s review and the concerns of some submitters could be addressed potentially by the LIP and it would be helpful to better understand why there is no such mechanism to enhance integration between projects and with the adjacent land in NoR 2.

Uncertainty about how residual land such as between the NoR 2 corridor and the rail corridor is to be managed as flagged requires further consideration in relation to how this land would be accessed and used. Again, it is suggested by Rebecca Skidmore that the use of an LIP may be appropriate as the current UDLMP condition is not potentially adequate.

A number of submitters raise concerns about the visual effect of the traffic and lighting (Rachel Beaurain and Barnardus Jacobus Beaurain) and others have concerns about landscape and visual impacts on residential amenity (McKean Family Trust) on their specific properties. Ms Skidmore has suggested more information on the potential effects on these properties would be helpful, in particular the impact of the permanent noise barriers that may be installed. I note as in relation to the noise effects on the live zoned land to the west of Segment 2, lighting effects on this land should also be considered.

Given the comments made by Ms Skidmore about the use of an LIP it would be helpful for the requiring authority to provide a response at the hearing on whether this tool could address the submitters specific site concerns and the changes to conditions suggested. I consider that the potential adverse effects can be avoided, remedied, or mitigated, subject to the above, and the proposed conditions as recommended to be amended.

6.5.12 Historic Heritage and Archaeological Effects

Requiring authority AEE

The AEE relies on the Pukekohe Transport Network Assessment of Effects on Historic Heritage, September 2023 by Matthew Campbell of CFG Heritage Limited submitted as part of the notice of requirement documentation.

Section 11.10.1.1 of the AEE notes that unrecorded archaeological and historic heritage sites may be present within the proposed designation boundaries, in particular near the banks of waterways such as the Ngaakoroa and Oira Streams and they could be impacted by the disturbance or removal of subsurface features and deposits at the construction phase. In addition, it is noted that no buildings which qualify as definite pre-1900 heritage has been recorded. No specific effects on known historic heritage in relation to NoR 2 is noted however there is a general recommendation in section 11.10.2 that further research and survey should be undertaken to support applications for HNZPTA authority before construction commences.

No operational effects to either known or unknown historic heritage deposits are noted.

Specialist Review

The council's Senior Specialist: Archaeology, Cultural Heritage Implementation Myfanwy Eaves has reviewed the NoR which is included in Attachment 3.

She notes that through the Multi-Criteria Assessment (MCA) process and designing elements away from the historic heritage sites (none are located in or near NoR 2) the impact on known historic heritage has been avoided. She is satisfied that from a historic heritage perspective all matters have been addressed in the technical assessment.

Planning Review

No submissions were received in relation to historic heritage in relation to NoR 2.

It is noted that Ms Eaves has expressed concern about wording in the Historic Heritage Management Plan (HHMP) condition as submitted where 'unexpected' is used instead of 'accidental' which she prefers. It is noted that there is no requirement for a Historic Heritage Management Plan in relation to NoR 2.

Given the comments made by Ms Eaves it would be helpful for the requiring authority to provide a response at the hearing on the changes to conditions suggested. I consider that the potential adverse effects on historic heritage can be avoided, remedied, or mitigated, subject to the above.

6.5.13 Arboricultural Effects

Requiring authority AEE

Sections 9.4 -9.7 of the AEE, in the description of the receiving environment for each of the four segments of NoR 2, notes that there are no trees protected under the district plan provisions of the AUP within the alignment.

Section 11.11.1 of the AEE discusses the positive effects of the NoRs in that they include sufficient space for a formal berm on both sides of the transport corridor. This will allow for the planting of new trees in an environment

conducive to good tree growth and enhance the emerging urban landscape where the projects are located in the FUZ.

Section 11.11.2.1 of the AEE discusses the construction effects related to the removal of trees where it is noted again that the works affecting the majority of trees that are potentially affected by the road network construction and upgrade are considered as a regional consenting matter.

A schedule of specific trees affected by each corridor is provided in Appendix B of the Assessment of Arboricultural Effects¹³ in Volume 4, Appendix H. There are no trees in NoR 2 that are identified.

Specialist Review

The council's arborist consultant Leon Saxon has reviewed the NoR and provided a response which is included in Attachment 3.

He notes that the trees located within the proposed designation are not protected by current District Plan rules, but rather by Regional Plan rules and that the tree protection relating to the rural areas applies to vegetation measuring greater than 6m in height or 600mm in girth [he is referring to the permitted standard for vegetation alteration in E26.3.5.1 and E26.3.5.2]. Within the rural zoned areas and Future Urban zoned areas of the FUZ, trees located within the road reserve are subject to the District Plan rules and trees are able to be removed as a Permitted Activity (E26.4.3.1[A90]). He notes that given the timeframe for the likely construction associated with some of the designations, it is considered that there is potential for trees to become protected between the time of designation and construction. This could occur through the growth of trees, or through changes in adjacent land zoning. As such, he considers that the condition for preparing a Tree Protection Management Plan should apply to all of the designations.

A condition is proposed in the NoR for the preparation of an Urban and Landscape Design Management Plan and the wording of the condition is considered suitable by Mr Saxon for ensuring that mitigation planting is carried out to a good standard.

Planning Review

The only reference to a tree in submissions to NoR 2 is the redwood tree referred to the submission from Madeline Robb at 319E Sim Road. there is no reference to this tree having been assessed in the Assessment of Arboricultural Effects. It is noted that other redwood trees that were assessed are in Outstanding Natural Feature overlays or are scheduled and therefore subject to protection under the district plan rules. If the redwood is taller than 6m then the tree's removal would be subject to a resource consent under the AUP regional rules. It would be helpful for the requiring authority to indicate if it's possible for the tree to be retained as the Urban and Landscape Design Management Plan (ULDMP) condition 1 requires that where practicable mature trees and vegetation is retained.

Given that vegetation removal in rural zones and FUZ land is subject to regional rules, I consider that the potential adverse effects on arboriculture can be avoided, remedied, or mitigated, subject to the above.

6.5.14 Community Effects

Requiring authority AEE

The only community and recreational facilities noted in Sections 9.4 -9.7 of the AEE, in the description of the receiving environment for each of the four segments of NoR 2 as being affected or close to the alignment is the Paerata Primary School which the AEE notes as being located approximately 1.5km away from the Paerata Link Segment.

Section 11.2 in the AEE discusses the positive effects of the network as a whole, noting them under the follow headings as:

- Supporting growth

¹³ by Craig Webb, dated September 2023

- Improving access
- Maintaining connectivity
- Safety improvements
- Improvements to active mode facilities
- Improved connections to public transport and rapid transit networks

Section 11.12 of the AEE discusses the community effects of all the NoRs and in relation to NoR 2 notes that the Drury to Pukekohe Link (NoR 2) provides a multi-modal link enhancing access to new urban areas in Drury, Paerata and Pukekohe and contributes to higher quality land transport integration outcomes for future communities.

The construction effects are discussed in 11.12.2 where relevant to NoR 2 it is noted that a number of the NoRs are new roads in undeveloped greenfield areas, resulting in fewer community impacts during construction. However, the acquisition of land will sever some properties and may prompt changes to some rural operations. Prior to construction, there may be a reduction in the existing rural community within the NoR 2 area as Waka Kotahi acquires properties and they become vacant. Notwithstanding this, the sections of the route in the FUZ are planned to urbanise and the proposed transport networks are expected to be implemented at the time that greenfield areas start to urbanise. Therefore, this is anticipated to be a temporary effect as the community transitions into an urban area once the land is live zoned.

The disruption effects on amenity values of construction on the existing and future urban areas is noted which is also relevant to NoR 2.

Section 11.2.3 notes that no adverse operational effects on the community are anticipated.

As noted in 11.12.5 of the AEE a Stakeholder Communication and Engagement Management Plan (SCEMP) will be prepared prior to the start of construction to identify how the public and stakeholders (including directly affected and adjacent owners and occupiers of land) will be communicated with throughout the Construction Works. Access and trip disruption will be managed by the CTMP and SCEMP proposed as conditions of the designation. Construction effects on amenity values of property can be managed by engagement with stakeholders identified through the SCEMP, as well as through the development and implementation of the CVNMP and the CEMP.

Planning Review

The employment benefits linked to the delivery of NoR 2 are noted in the Fisher & Paykel Healthcare submission in support of the NoR, as a nearby landowner looking to develop a research and development and manufacturing campus nearby.

There are a number of submissions such as the one from J C Thompson with concerns about the health and safety of residents due to fumes and traffic noise. Traffic noise is addressed above however the issue of health and safety is not directly addressed in the AEE.

I note that a submission has been received from the Ministry of Education in which concern about the potential for existing schools, or any future schools developed in this area, to be affected. The Ministry's submission states the ministry is neutral but is seeking to ensure that appropriate conditions are included in the designations to mitigate any adverse effects associated with the construction of the Pukekohe transport network. I think that construction effects and operational effects on all of the school sites (as community facilities) have not been assessed as the AEE identifies Paerata Primary School as the only community and recreational facility in the vicinity of NoR 2. This is not correct as the designated site at Tuhimata Road and Wesley College are just as close to the designation.

The Ministry of Education is seeking to changes to conditions to ensure that appropriate conditions are included in the designations to mitigate any adverse effects associated with the construction of the Pukekohe transport network on its schools. The changes include the addition of two terms 'educational facilities' and 'Stakeholders' with definitions consistent with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing. I think that there is merit in including these definitions and have included them in Attachment 5.

In addition, the Ministry of Education's submission is seeking inclusion of the Ministry and schools in the SCEMP; and inclusion of the Ministry and schools as stakeholder in the CTMP along with other changes such as avoiding AM and PM peaks on roads close to schools. Mr Edwards supported the inclusion of changes to the CTMP in this regard and they are shown in Attachment 5. In addition, it would be helpful to hear from the requiring authority on any impacts on the other schools and the changes to conditions requested by the Ministry as noted previously, especially in relation to the need to align the conditions with those used elsewhere in the region

I note that the Paerata Rail Station (designation 6311) is under construction- as noted in relation to NoR 3. KiwiRail have submitted in relation to Designation 6302 and 6311 and the interface with NoR 2 and identified the need to allow for an increase in track capacity and maintenance. While the project is expected to deliver better connectivity to Paerata Rail Station, the benefits to the community from this connectivity and from the rail line itself can only be realised if the services undertaken on the NIMT are not constrained.

The need to integrate with the work being done by KiwiRail is also raised by Paerata 5 Farms Limited. Paerata 5 Farms Limited is the owner of 412 Sim Road and authorised by the owner of 328 Sim Road to submit on their behalf. Both sites are FUZ land.

It would be useful to hear from the requiring authority to better understand how these two transport asset providers are interfacing to achieve the community benefits attributed to NoR 2 and the other parts of the Pukekohe Transport network without detrimental impacts on the NIMT which has a national significance in terms of freight, and other passenger (national, interregional and commuter) functions.

It would also be helpful for the requiring authority to provide a response at the hearing in relation to health and safety and other effects of the project and the concerns about impacts on dwellings linked to the 20 year lapse.

At this time, I consider that the potential adverse effects on community facilities can be avoided, remedied, or mitigated, but this assessment is subject to the above information being provided.

6.5.15 Property and Land Use Effects

Requiring authority AEE

The description of the receiving environment in section 9.5 of the AEE of each of the four segments of NoR 2 outlines the following:

- Segment 1: Pastoral land use, interspersed with rural residential properties and areas of arable land.
- Segment 2: the land use is characterised by pastoral with clusters of rural residential development (including an equine veterinary). The area is identified as highly productive land under the NPS HPL.
- Segment 3: The land use is predominantly characterised by working agricultural land, with occasional rural residential properties and farmsteads (including a poultry farm with large sheds).
- Segment 4: Rural. The land use is agricultural land (predominantly pastoral) interspersed with clusters of rural residential development.

Property effects are considered in Section 11.13 of the AEE discusses potential adverse effects on existing private properties noting that they have been reduced where practicable. The section notes that NoR 2 in particular affects more properties due to the length of the corridor.

The discussion notes that potential adverse effects on the development of private property may arise. However, it is noted in the AEE that development is not precluded within the proposed designated area. Waka Kotahi will work with landowners and developers under the process in s176(1)(b) of the RMA to provide written consent for development within the proposed designations, provided those works will not prevent or hinder the work authorised by the proposed designation.

Section 11.13.1 of the AEE notes that land required for the permanent work will be acquired prior to construction and if temporary occupation is required then the land will be leased.

Landuse effects are closely tied to property effects, and these are noted in Section 11.13.1 under Construction Effects in the AEE as ranging from the temporary lease/use of land include disruption to farm activities and

businesses, disruptions to access, loss of vegetation, temporary loss of grazing pasture and temporarily affected amenity.

Measures such as development and implementation of a SCEMP, CTMP, CNVMP and CEMP prior to the start of construction are noted as appropriately minimising disruption to affected properties and allow the continued use of the properties were practicable. Potential construction effects will generally be temporary.

The post construction effects are noted in section 11.13.2 of the AEE and are focused on the process of redefining the designation boundary after the Completion of Construction and any land not required for the permanent work or for the ongoing operation, maintenance or mitigation of effects of the Project being reinstated in coordination with directly affected landowners or occupiers and returned. The timing for this process occurring is unstated.

Planning Review

No Council specialist assessment has been sought for property and land use effects. However, I agree with the AEE that there is an overlap between the property and land use effects, but also that the other effects such as transport, noise and vibration and community effects will also play a part in relation to land use effects in terms of the land not directly affected by the NoR.

Even from the period that the NoR was served, the designation can be expected to have commenced to have had effects on normal property and land use activity on both the directly affected and on the adjacent land.

In terms of the effects on the directly affected while I note that the Public Works Act 1991(PWA) is the legislative framework under which entitled landowners will receive compensation and that this is a non-RMA process, the restrictions imposed on private property is a land use effect. This is because the uncertainty that the NoR can create for landowners can result in some landowners being reluctant to actively manage their land. Given the rural / farming land use located close to the NoR , this could result in a form of blight and a loss in production due not the land being unattended to or less actively managed and this could result in physical changes and a reluctance to investment. The 20 year lapse period will be playing a part in relation to this.

The key issue for many of the submitters as expressed in their submissions is concern about how they can continue to operate the farm or business or live in their home both with the uncertainty of the 20 year lapse period and the timeframe for the works are completed. Some have sought as relief changes to the alignment of the designation to the construction extent, and/ or that the NoR is declined.

The submission from Public Works Advisory Limited highlights the impact of NoR 2 on residential dwellings as planning blight over the proposed 20 year designation period. It seeks the conditions to be amended to address residential dwellings fully impacted by the designation.

Only one of the submitters has specifically questioned the lapse period (Paerata 5 Farms Ltd), stating that the 20 year lapse period sterilises the land holding which they had expected to be rezoned by now. The submitter asks that the NoR is declined or that the NoR is amended to address the submitters concerns.

Paerata 5 Farms Ltd has in its submission also indicated concern about the conditions of the NoR 2 (and 3) and is concerned about the necessity for the two east-west road connections (three including the KiwiRail designation) through the submitter's landholding. The loss of development potential on the FUZ land is a key concern as well as the concern that no provision has been made for potential road future connections from the development on the land. There are also concerns about creation of 'no mans land' and the impact of design proposals.

A number of submitters (D & K Sim Ltd, S Owers, M Robb and D& S Carpenter) raise the issue of loss of productive land. The Rural – Mixed Rural zoned land subject to the NoR is identified as being Highly Productive land under the transitional definition in the National Policy Statement on Highly Productive Land (October 2022) (NPS-HPL). There are a number of sites in this situation. The largest sites affected by NoR 2 that are also identified as 'Highly Productive land' are 357 Burt Road located to the south of the rail corridor and the land at the end of Bycroft Road (Lot 2 DP 503409). Most of the other sites appear to be much smaller although it is noted that intensive farming operations can occur on small sites and some farming activities may occur across a number of the land holdings. The effects of the removal of highly productive land are not specifically assessed in

the AEE. There is an assessment of the relevant NPS-HPL objectives and policies where it is noted that the alignment of the designation (along with that of NoR 4 and 8) will not significantly erode or fragment the highly productive land.

It would also be helpful to hear from the requiring authority in response to the issues raised in relation to the property and landuse effects by the submitters. While it is noted that the conditions set includes a condition (5) that provides for Network Utility Operators with existing infrastructure located within the designation to undertake a range of work without requiring written consent under section 176 of the RMA, there is no such provision for directly affected landowners who for potentially 20 years will need permission from Waka Kotahi to undertake work on their own land. Providing some certainty on what can be done on the land without needing to seek approval from Waka Kotahi given the long lapse period would assist many potentially.

It would also be useful to hear if the concerns about the impact on FUZ land owned by Paerata 5 Farms Ltd due to the two transport designations (KiwiRail's 6311 and NoR 2) can be addressed through the proposed conditions.

It would also be useful to understand if any specific effects on the use of highly productive land both before and during construction have been identified by the requiring authority and if they can be addressed to ensure that the production potential for the land around the NoR and within the NoR and the ongoing viability of their business is retained (such as ensuring vehicle access to properties for farming activities during construction and limiting construction impacts during times where there are high levels of farming activity such as calving or lambing etc.).

It is common to also have a condition that sets out the process for removing the designation but there are no conditions related to this process. It would be helpful to understand why.

At this time, I consider that the potential adverse effects on property and land use can be remedied or mitigated, but this assessment is subject to the above information being provided and potentially changes to the conditions to address how the ongoing use of the directly affected land will be enabled given the long lapse period sought.

6.5.16 Effects on Network Utilities /other infrastructure providers

Requiring authority AEE

Section 10 of the AEE includes information about the engagement KiwiRail and network utilities that has occurred throughout the development of the Pukekohe Transport Network. It notes that regular meetings were held with KiwiRail to provide updates and discuss interfaces with KiwiRail projects and the Pukekohe Transport Network and engagement with the network utilities has been through a two monthly forum. It notes that the forum includes representatives from Watercare, Vector, First Gas and Transpower and feedback from network utilities has been considered through alternatives assessment and concept design of the project. Section 10 of the AEE states that Transpower has provided high level information around the required clearances from the road to the conductor, and other information on working around lines and towers (including tower site access, earthworks near the tower, and earth potential rise).

Section 11.14 of the AEE provides a list of known existing and proposed utilities within and around the proposed designation. The following network utilities and requiring authorities with assets or designations in the footprint of NoR 2 are noted:

Utility Provider /Requiring Authority	Asset	Designation reference in the AUP
KiwiRail	North Island Main Trunk Railway Line	6302
Watercare	Watermain, sewer main, and pipe assets	N/A
Counties Energy	ADSS fibre optic cable and medium and high voltage cables	
New Zealand Transport Agency	State Highway 22: Karaka to Pukekohe	6704

New Zealand Transport Agency	State Highway 22: Karaka to Pukekohe – Road Widening	6705
KiwiRail	Paerata Interchange and Accessway	6311
Transpower New Zealand Limited	National Grid (Overlay)	n/a

Section 11.14 notes that to undertake work in accordance with a designation on land where there is an existing designation in place, the written consent of the requiring authority for the earlier designation is required under section 177(1)(a), however it is noted that this has not been obtained at this stage as it is not required to designate the land. The discussion in the AEE notes that consultation with the requiring authorities, whose approval will be required in the future, has taken place and will continue as the Project is developed. To mitigate effects on network utilities, section 11.14.1 notes that a Network Utilities Management Plan (NUMP) will be prepared prior to construction of the Project in consultation with the relevant network utility operators. The discussion explains that the NUMP will set out a framework for protecting, relocating and working in proximity to existing network facilities.

Planning Review

No Council specialist assessment has been sought for effects on network utilities and other infrastructure. It is noted that submissions to NoR 2 have been received from the following Requiring Authorities and network utilities:

- Submission 5 - Telecommunication submitters (Aotearoa Towers Group (ATG), Chorus New Zealand Limited(Chorus), Connexa Limited (Connexa), One New Zealand (One NZ) (formally Vodafone New Zealand Ltd) and Spark New Zealand Trading Limited (Spark));
- Submission 24 - KiwiRail Holdings Limited(KiwiRail);
- Submission 26 - Watercare Services Limited (Watercare);and
- Submission 29 -Counties Energy Limited(CEL).

The Telecommunication Group point out that none of the group are listed in Section 11.14 of the AEE despite having existing infrastructure within and around the proposed designated boundaries and seek to ensure that existing and potential future telecommunications infrastructure in the project corridors are adequately addressed and oppose the NoR if their concerns are not addressed. The submission points out that the works enabled by the proposed designations will affect existing infrastructure that will need to be protected and/or relocated as part of the proposed works and that while provision is made for a condition called the Land Use Integration Process (LIP) in the Auckland Transport's Notices of Requirement there is no provision for an LIP in NoR 2. The submission notes that exclusion of LIP conditions creates a potential lack of integration and dialogue between the project teams and existing infrastructure providers such as the Telecommunications Submitters. They seek amendment of the NUMP conditions and an advice note to be added to the NUMP condition unless a LIP condition or similar is added.

KiwiRail's submission in relation to NoR 2 as noted under section 6.7.14 notes that the NoR allows for an increase in track capacity but limits provision of maintenance access to improve resilience and while supporting the NoR seeks ongoing dialogue and engagement before detailed design starts. KiwiRail seeks changes to condition 5, 10 and 26.

Watercare's submission states that Watercare neither supports or opposes any of the Pukekohe NoR but seeks to ensure that any decisions made respond to the issues raised in this submission. In particular that the works provided for under the NoR's avoids, remedies or mitigates potential adverse effects on Watercare's ability to provide water and wastewater services now and in the future. In relation to NoR 2 Watercare's submission notes that there is the potential that the proposed Wesley /Paerata Watermain along Kraka Road from Runciman Road and a new rising main along Paerata Road that conveys flows to Pukekohe from a new wastewater pump station in Paerata intersect with the NoR 2 alignment. Watercare acknowledges the engagement to date and seeks early engagement to enable opportunities to plan and future proof the delivery of assets to provide for well-functioning urban environments. In addition, Watercare wishes to ensure it maintains access to its assets 24

hours a day, 7 days a week for maintenance, safety and efficient operation of its services. Watercare while supporting the conditions related to the NUMP SCEMP and LIP considers further amendments are required to the NUMP condition and Watercare also seeks that the LIP condition is included in Waka Kotahi's NoRs, as opposed to only being included in the Auckland Transport NoRs as is currently proposed.

The CEL submission indicates general support for the NoR but notes omissions in terms of the information about its existing overhead and underground infrastructure provided in drawings submitted with the NoR. In addition CEL require further consultation and detailed planning concerning parts of NoR 2 (and the other NoRs) which may impact the location and safe operation of the assets and further consultation and detailed planning where it is proposed to cut or fill in the vicinity of existing overhead or underground assets in order to maintain compliance with NZECP34:2001 New Zealand Electrical Code of Compliance for Electrical Safe Distances, and to maintain optimum operation and safety around equipment associated with underground electricity distribution and fibre cables

There is no specific discussion about effects on these utilities or assets in section 11 of the AEE. There is discussion in Table 12-1 of the AEE against the relevant statutory provisions in relation to the objectives and policies of the NPS-ET. This notes that in the case of NoR 2, the transport corridor been designed so that it will not compromise the integrity of the National Grid, will not lead to reverse sensitivity issues and will comply with safe distance requirements including access to and earthworks in proximity to towers, spacing beneath transmission lines and metallic installations near the towers (Earth Potential Rise risks).

Works within the existing road reserve are controlled under the Utilities Access Act 2010 and associated National Code of Practice for Utility Operators Access to Transport Corridors. The Code of Practice allows utility providers to access the road reserve (excluding motorways) as of right, subject to reasonable conditions imposed from the transport authority. Access to the local road network subject to NoR 2 is managed through a Corridor Access Request process to Auckland Transport currently as the region's road controlling authority. This means that a network utility would need to seek written consent from Waka Kotahi and obtain a Works Approval Permit from Auckland Transport although Condition 5 as proposed sets out when such works do not need Waka Kotahi approval under section 176 of the RMA.

As there is no further discussion on the effects on network utilities, it is not clear if the mitigation proposed in the form of the NUMP (condition 2) and Condition 5 will be adequate. However, it is noted that in addition to KiwiRail, the Telecommunication Group and Watercare also consider that further work on Condition 5 is needed and it would be useful to hear from the requiring authority in relation to the changes requested.

In addition, it would be useful to understand why the Land Use Integration Process (LIP) is not included with the Waka Kotahi conditions and the requiring authority's views on requested changes to condition 5, 10 and 26.

For the benefit of the submitters and commissioners the relevant conditions from the Auckland Transport condition set as submitted are outlined below:

Land use Integration Process (LIP)

The Requiring Authority shall set up a Land use Integration Process for the period between confirmation of the designation and the Start of Construction. The purpose of this process is to encourage and facilitate the integration of master planning and land use development activity on land directly affected or adjacent to the designation. To achieve this purpose:

- (a) Within twelve (12) months of the date on which this designation is included in the AUP, the Requiring Authority shall include the contact details of a nominated contact on the project website (or equivalent information source) required to be established by Condition 2(a)(iii).*
- (b) The nominated contact shall be the main point of contact for a Developer or Development Agency wanting to work with the Requiring Authority to integrate their development plans or master planning with the designation.*
- (c) At any time prior to the Start of Construction, the nominated contact will be available to engage with a Developer or Development Agency for the purpose of:*

- (i) *responding to requests made to the Requiring Authority for information regarding design details that could assist with land use integration; and*
 - (ii) *receiving information from a Developer or Development Agency regarding master planning or land development details that could assist with land use integration.*
- (d) *Information requested or provided under Condition 9(c) above may include but not be limited to the following matters:*
- (i) *design details including but not limited to:*
 - A. *boundary treatment (e.g. the use of retaining walls or batter slopes);*
 - B. *the horizontal and vertical alignment of the road (levels);*
 - C. *potential locations for mid-block crossings; and*
 - D. *integration of stormwater infrastructure.*
 - (ii) *a process for the Requiring Authority to undertake a technical review of or provide comments on any master planning or development proposal advanced by the Developer or Development Agency as it relates to integration with the Project; and*
 - (iii) *details of how to apply for written consent from the Requiring Authority for any development proposal that relates to land is within the designation under section 176(1)(b) of the RMA.*
- (e) *Where information is requested from the Requiring Authority and is available, the nominated contact shall provide the information unless there are reasonable grounds for not providing it.*
- (f) *The nominated contact shall maintain a record of the engagement between the Requiring Authority and Developers and Development Agencies for the period following the date in which this designation is included in the AUP through to the Start of Construction for a Stage of Work. The record shall include:*
- (i) *a list of all Developers and Development Agencies who have indicated through the notice of requirement process that they intend to master plan or develop sites along the Project alignment that may require specific integration with the designation;*
 - (ii) *details of any requests made to the Requiring Authority that could influence detailed design, the results of any engagement and, where such requests that could influence detailed design are declined, the reasons why the requiring authority has declined the requests; and*
 - (iii) *details of any requests to co-ordinate the forward work programme, where appropriate, with Development Agencies and Network Utility Operators.*
- (g) *The record shall be submitted to Council for information ten working days prior to the Start of Construction for a Stage of Work*

At this time, I consider that the potential adverse effects on network utilities and other infrastructure can be avoided, remedied or mitigated, but this assessment is subject to the above information being provided.

6.5.17 Effects conclusion

In regard to the overall effects of the Project, I consider that subject to the provision of the information requested and further amendments to the conditions recommended above and included in Attachment 5 to this report, the potential adverse effects on the environment from the construction and operation of NoR 2 can be appropriately avoided, remedied or mitigated.

6.6 National policy statements

Section 171(1)(a)(ii) requires the council to, subject to Part 2, consider the effects on the environment of allowing the notice of requirement, having particular regard to any relevant provisions of a national policy statement.

6.6.1 National Policy Statement on Urban Development 2020 ('NPS-UD')

The NPS-UD has the primary objective of ensuring that New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. This also includes, among other things, improving housing affordability by supporting competitive land and development markets and ensuring that urban environments are integrated with infrastructure planning and funding decisions. The NPS-UD also requires that local authorities must be satisfied that additional infrastructure to service the development capacity is provided and likely to be available in addition to being resilient to the current and future effects of climate change.

The requiring authority has assessed the Project against the relevant provisions of the NPS-UD in Table 12-1 of the AEE. In summary, the requiring authority finds that the Project consistent with the objectives and policies by providing for the necessary transport infrastructure to support the development of land and the eventual establishment of the necessary development capacity.

I concur with these conclusions and consider that the NoR will support and enable future growth proposed in the Pukekohe area while also promoting and providing for active modes of transport and public transport. In that regard, I agree that the NoR give effect to the NPS-UD. In addition, I consider that the conditions, as recommended to be amended, will give effect to the NPS-UD.

6.6.2 National Policy Statement on Freshwater Management 2020 (NPS-FM)

The NPS - FM endeavours to implement Te Mana o te Wai by prioritising first the health and well-being of water bodies and freshwater ecosystems followed by the health needs of people and then the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.

Its objective and policies endeavours to ensure that natural and physical resources are managed in a way that prioritises first, the health and well-being of water bodies and freshwater ecosystems followed by the health needs of people and then the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future. In particular, the NPS-FW seeks to protect natural wetlands, rivers, outstanding waterbodies and habitats of indigenous freshwater species.

It is noted that these provisions will apply at the regional consent stage for consents sought under section 13, 14 and 15 of the RMA.

In the context of route selection and protection under these NoRs the requiring authority has assessed the Project against the relevant provisions of the NPS-FW in Table 12-1 of the AEE. Even though the AEE notes that the AEE is focused on district plan matters the requiring authority concludes that contributes to the eider Pukekohe Transport Network contributes to achievement of these objectives and policies by avoiding or minimising adverse effects on water bodies and freshwater ecosystems at this stage (noting regional consents will be obtained in future).

6.6.3 National Policy Statement on Electricity Transmission 2008 ('NPS-ET')

The NPSET endeavours to recognise and provide for the significance of the electricity transmission network, by facilitating the operation, maintenance and upgrade of the network whilst managing adverse effects of the network and managing adverse effects of other activities on the network.

The requiring authority has assessed the Project against the NPS-ET in Table 12.1 of the AEE. It notes that NoR 2 interacts with the Transpower National Transmission Grid as depicted in the AUP through the National Grid Overlay (refer Figure 6-3 below).

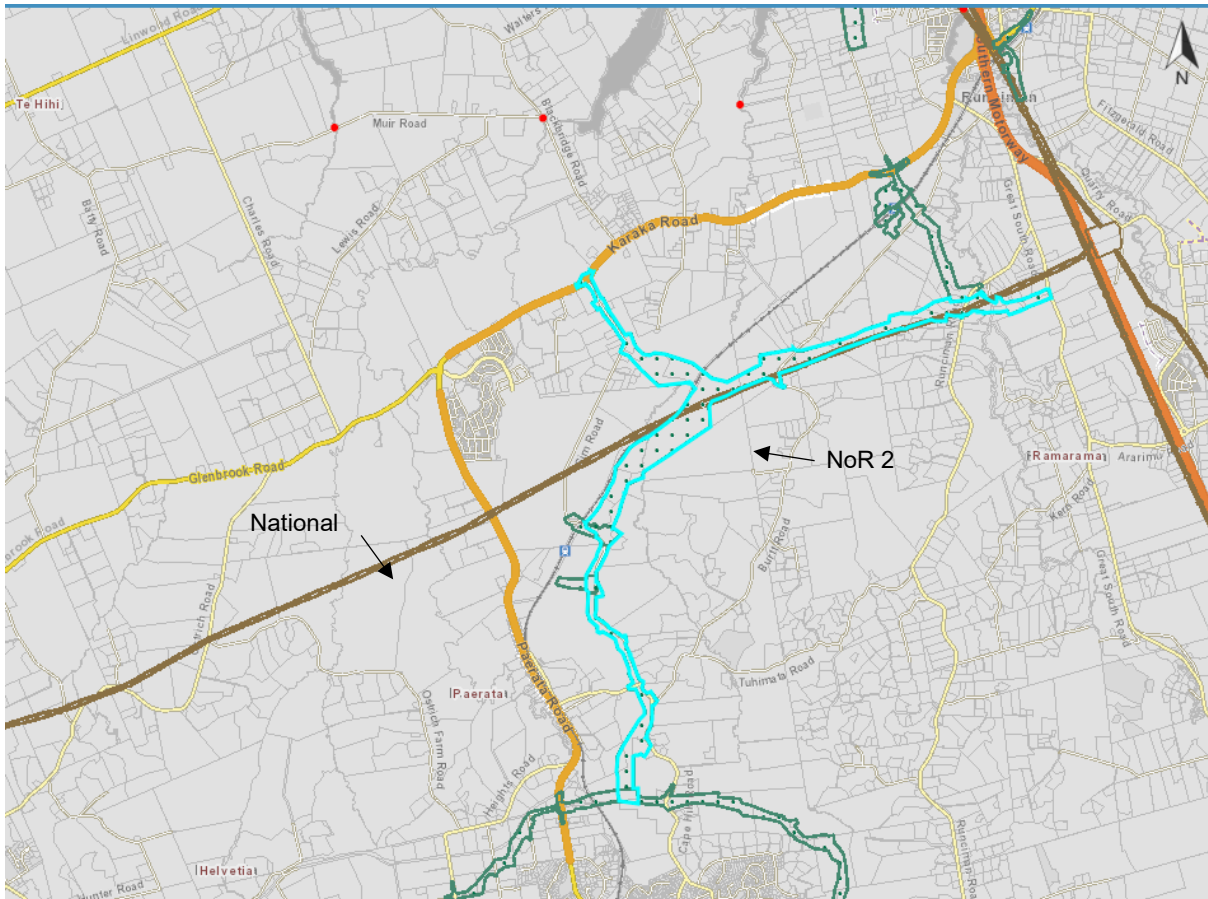


Figure 6-3 National Grid Overlay in relation to NoR 2

The NPS-ET objectives seek that the national significance of the electricity transmission network is recognised while managing adverse effects of other activities on the network. The policies of the NPS-ET outline that reverse sensitivity effects on the electricity transmission network are avoided and that the operation, maintenance, upgrading and development of the electricity network is not compromised. The requiring authority concludes that the NoR 2 transport corridor been designed so that it will not compromise the integrity of the National Grid and will not lead to reverse sensitivity issues and will comply with safe distance requirements. The projects have been discussed with Transpower and the concept design accounts for Transpower requirements including access to and earthworks in proximity to towers, spacing beneath transmission lines and metallic installations near the towers (Earth Potential Rise risks). This means that the requiring authority considers that the Pukekohe Transport Network contributes to the achievement of these objectives and policies by enabling strategic transport infrastructure where appropriate while ensuring that adverse effects are avoided, remedied or mitigated.

6.6.4 New Zealand Coastal Policy Statement (NZCPS)

The NZCPS contains objectives and policies relating to the coastal environment. Consideration of the NZCPS has not been undertaken in the AEE specifically. address the NZCPS. However, the requiring authority's consideration of Part 6 (section 13.1 of the AEE) of the RMA does state:

'The proposed designations will not impact upon any existing public access to streams or the CMA. The Pukekohe Transport Network has the potential to increase access to rivers/streams by providing walking and cycling facilities and integrating with future parks and connections proposed through development.'

The project also includes a range of measures to be included in management plans relating to maintaining water quality in streams that discharge into the Manukau Harbour. These measures can be further developed and adapted at the detailed design and Outline Plan of Works stages.

Overall, I consider that NoR 2 is consistent with the NZCPS subject to the conditions, as recommended to be amended.

6.6.5 National Policy Statement on Highly Productive Land ('NPS-HPL')

The NPS-HPL came into effects on 17 October 2022 and has the broad objective that:

2.1 Objective

Objective: Highly productive land is protected for use in land-based primary production, both now and for future generations.

The definition of "highly productive land" is as follows:

'highly productive land means land that has been mapped in accordance with clause 3.4 and is included in an operative regional policy statement as required by clause 3.5 (but see clause 3.5(7) for what is treated as highly productive land before the maps are included in an operative regional policy statement and clause 3.5(6) for when land is rezoned and therefore ceases to be highly productive land).'

The areas subject to the transitional definition have been mapped in the AUP.

The NPS-HPL contains 9 policies to implement the objective and these policies include the following relevant policies:

Policy 1: Highly productive land is recognised as a resource with finite characteristics and long-term values for land-based primary production.

Policy 4: The use of highly productive land for land-based primary production is prioritised and supported.

Policy 8: Highly productive land is protected from inappropriate use and development.

In combination these policies set a high threshold for protection of soil, primarily for the production of food. However, the NPS-HPL also recognises land designated for infrastructure in section 3.9. This section relates to circumstances where the use or development of highly productive land is appropriate and includes the following in section 3.9(2)(h):

- (h) it is for an activity by a requiring authority in relation to a designation or notice of requirement under the Act:

Section 3.9(2)(j) also provides:

- (i) it is associated with one of the following, and there is a functional or operational need for the use or development to be on the highly productive land:
- (j) the maintenance, operation, upgrade, or expansion of specified infrastructure:

The AEE only lightly touches on this NPS within Table 12-1 of the AEE where the assessment centres on the exemptions in Clause 3.9(2) of the NPS-HPL and concludes that they apply. The assessment also concludes that because the projects [NoR 2] are generally located along the edge of the highly productive land or will enable the ongoing use of the land either side of the projects for rural production purposes it contributes to the achievement of the NPS-HPLs objectives and policies. It states that adverse effects of the projects on adjacent highly productive land will be appropriately mitigated prior to construction is required. It also states that a new road is one of the listed exemptions for specified infrastructure and the presence of specified infrastructure on HPL does not preclude the balance of the HPL being used by land-based primary production.

It is one of the contentions of some submitters that the designation should be moved towards the rail corridor or the extent of the designation reduced (Submission 14) on the property – 319B Sim Road which is identified as being 'highly productive land'.

There is guidance produced¹⁴ to assist in the implementation of the NPS-HPL that notes that minimises or mitigates a loss of productive capacity could include:

- The location of the activity – whether it can be sited somewhere on the subject site that minimises the impact on the productive capacity of HPL
- The footprint of the activity – whether efforts have been made to keep the footprint of the activity as small as possible to minimise the actual loss of HPL
- Clustering of activities – whether there is an option to group a number of activities in a similar location to mitigate the cumulative loss of HPL that would occur through activities being spread out across a wider area of HPL (eg, clustering of buildings, co-location of telecommunications infrastructure or containing multiple activities in the same building, such as using an existing residential dwelling for a home business or visitor accommodation activity, rather than constructing multiple buildings)
- Co-existing with land-based primary production – whether the activity can be designed in such a way that it does not preclude being able to carry out land-based primary production around the activity (eg, the potential for using the land around specified infrastructure to be used for vegetable production or animal grazing).

I agree that NoR 2 falls within the exceptions listed above in (h) and (j) and is therefore consistent with the NPS-HPL. However, Clause 3.9(3) (b) of the NPS-HPL requires that the territorial authority must take measures that avoids if possible or mitigates actual or potential reverse sensitivity effects on land-based primary production activities from the use avoided or minimised. It is clear from the submissions that there is concern that the NoR prior to and during construction has the potential to create actual or potential reverse sensitivity effects on the adjacent primary production activities. It would be helpful to better understand from the requiring authority how the conditions and any other processes are able to avoid or minimise this effect.

As noted in Section 6.6.15 the effects of the removal of highly productive land are not specifically assessed in the AEE so it is not clear how the impact on highly productive land has been minimised. It would be helpful to receive that information from the requiring authority to confirm that the works are consistent with the NPS-HPL.

6.6.6 National Policy Statement on Indigenous Biodiversity 2023 (NPS-IB)

The National Policy Statement on Indigenous Biodiversity (NPS-IB) applies to indigenous biodiversity in the terrestrial environment and has just come into force. Clause 1.4 of the NPS-IB notes that it applies to the terrestrial coastal environment in conjunction with the NZCPS and that if there is conflict the NZCPS prevails. Clause 1.4 also notes that if there is a conflict between the provisions of the NPS-IB and the NPS- FM or the Resource Management (National Environmental Standards for Freshwater) Regulations 2020, the latter prevail.

The NPS-IB seeks to maintain indigenous biodiversity across New Zealand so that there is at least no overall loss in indigenous biodiversity. The Policies of NPS-IB seek that a cautionary approach is used when considering effects on indigenous biodiversity both within and beyond Significant Natural Areas (SNAs) and including areas supporting highly mobile fauna. Increased indigenous vegetation cover in urban and non-urban environments is promoted, as is information gathering and monitoring of indigenous biodiversity.

The NPS-IB prioritises the mauri and intrinsic value of indigenous biodiversity and recognises people's connections and relationships with indigenous biodiversity while recognising the relationship between indigenous species, ecosystems, the wider environment, and the community and in particular the bond between tangata whenua and indigenous biodiversity and obligations of care that tangata whenua have as kaitiaki of indigenous biodiversity among other principles.

As noted in Table 12-1 of the AEE the route has avoided high value habitat areas and SEA. Most of the route of NoR 2 has already been modified by the farming activities that have occurred however there are areas of indigenous biodiversity located close to the streams. In the context of route selection and protection under this NoR the requiring authority has assessed the Project against the relevant provisions of the NPS-IB. Even though

¹⁴ Ministry for the Environment. 2023. National Policy Statement for Highly Productive Land: Guide to implementation. Wellington: Ministry for the Environment.

the AEE notes that the AEE is focused on district plan matters the requiring authority concludes that contributes to the wider Pukekohe Transport Network contributes to achievement of these objectives and policies by avoiding or minimising adverse effects on water bodies and freshwater ecosystems at this stage (noting regional consents will be obtained in future).

I agree with this assessment.

6.7 Regional Policy Statement (Chapter B of the AUP) (RPS)

The RPS sets the strategic direction for managing the use and development of natural and physical resources throughout Auckland. The following sections of the RPS are considered relevant to the NW Local Arterial NoRs:

- Chapter B2 Tāhuhu whakaruruhau-ā-taone – Urban Growth and Form
- Chapter B3 Ngā pūnaha hanganga, kawekawe me ngā pūngao – Infrastructure, transport and energy
- Chapter B4 Te tiaki taonga tuku iho – Natural heritage
- Chapter B5 Ngā rawa tuku iho me te āhua – Historic heritage and special character
- Chapter B6 Mana Whenua
- Chapter B7 Toitū te whenua, toitū te taiao – Natural resources
- Chapter B10 Ngā tūpono ki te taiao – Environmental risk

The requiring authority has assessed the Project against the relevant provisions of the RPS in Section 12 and Table 12-1 of the AEE under themes as follow:

RPS Chapter	Theme in Table 12-1
Chapter B2	Urban growth and development capacity
	Urban form and quality design
	Natural hazards
Chapter B3	Urban growth and development capacity
	Enabling infrastructure
	National Grid
	Urban form and quality design
Chapter B4	Ngā Manawhenua
	Natural landscapes
Chapter B5	Historic Heritage
Chapter B6	Ngā Manawhenua
Chapter B7	Indigenous Biodiversity and ecological values
	Freshwater
	Ngā Manawhenua
Chapter B9	Urban growth and development capacity
	Highly Productive Land
Chapter B10	Natural hazards

I generally agree with the requiring authority's assessment under the RPS provisions subject to the changes recommended to conditions and the content and implementation of the management plans and processes proposed as part of the NoR.

However, I note that the NoR 2 is in a number of locations on the boundary of the RUB and it is likely based on other locations around the region that owners abutting the new road corridor will place pressure on the Council to amend the RUB boundary once the road is confirmed. This will place the Council under pressure to revisit the location of the RUB.

6.8 Auckland Unitary Plan district plan provisions

6.8.1 Auckland Unitary Plan (Operative in part)

The Auckland Unitary Plan district plan provisions are addressed in section 12 and Table 12-1 of the AEE (along with the RPS provisions discussed above).

I generally concur with SGA's assessment of the Project against the AUP district plan provisions. I consider NoR 2 to be consistent with the AUP district plan provisions.

6.8.1.1 Auckland Unitary Plan - Chapter D overlays

Chapter D provisions are identified in the receiving environment descriptions in sections 9.4-9.7 of the AEE and addressed in section 12 and Table 12.1 of the AEE

The NoR is subject to a range of overlays in the AUP including the following:

	Segment 1	Segment 2	Segment 3	Segment 4
D1: High Use Aquifer Management Areas Overlay [rp]	✓	✓	✓	✓
D3 High Use Stream Overlay[rp]	✓			
D26: National Grid Overlay [dp]	✓	✓		

The provisions of Chapter D1 and D2 are regional provisions. Therefore, an assessment of these will be required at the regional resource consent stage.

Without repeating the detail of the assessment in the AEE, the requiring authority concludes that NoR 2 is consistent within the overlay provisions. I concur with the assessment of the requiring authority and have no further comments to add.

6.8.1.2 Auckland Unitary Plan - Chapter E Auckland-wide

The following Auckland wide chapters are addressed by the requiring authority in Table 12.1 of the AEE. Without repeating the detail of this assessment, it is considered that relevant Chapter E chapters are:

- E1 Water quality and integrated management
- E11 Land disturbance - Regional
- E12 Land disturbance – District
- E15 Vegetation management and biodiversity
- E17 Trees in roads
- E25 Noise and vibration
- E26 Infrastructure
- E27 Transport
- E36 Natural hazards and flooding.

I agree with the assessment provided by SGA in section 12 and Table 12-1 of the AEE on these matters.

I note that Table 12 -1 did not consider the following Auckland -Wide Chapters:

- E2 Water quantity, allocation and use
- E3 Lakes, rivers, streams and wetlands
- E8 Stormwater - Discharge and diversion
- E9 Stormwater quality - High contaminant generating car parks and high use roads
- E24 Lighting

While I recognise that the effects of stormwater discharges (quality and quantity) , and discharges to streams and works in streams are the subject of regional consents, it would be helpful if these had also been considered in Table 12.1 especially given the large amount of new impervious area proposed and the impact on the streams

the new road will cross resulting in works and discharges. I also note that lighting effects have been recognised there is no assessment in terms of relevant objectives and policies.

6.8.1.3 Auckland Unitary Plan – Chapter H Zones

Chapter H provisions are addressed in section 12 and Table 12.1 of the AEE. The relevant zones are considered to be:

- H18: Future Urban Zone
- H19: Rural Zones – Mixed Rural Zone
- H19 Rural – Countryside Living Zone

I concur with the requiring authority's assessment provided in section 12 and Table 12-1 of the AEE of the above provisions of Chapter H.

6.8.1.4 4.7.2 Council-Initiated Proposed Plan Changes to the Auckland Unitary Plan (Operative in part)

Section 43AA of the RMA provides the meaning of proposed plan:

(2) *In this Act, unless the context otherwise requires, proposed plan—*

(a) *means a proposed plan, a variation to a proposed plan or change, or a change to a plan proposed by a local authority that has been notified under clause 5 of Schedule 1 or given limited notification under clause 5A of that schedule, but has not become operative in terms of clause 20 of that schedule; and*

(b) *includes—*

(i) *a proposed plan or a change to a plan proposed by a person under Part 2 of Schedule 1 that has been adopted by the local authority under clause 25(2)(a) of Schedule 1:*

(ii) *an IPI notified in accordance with section 80F(1) or (2).*

(3) *Subsection (1) is subject to section 86B and clause 10(5) of Schedule 1.*

The table below lists the council-initiated proposed plan changes to the AUP that I consider are relevant to NoR 2. These plan changes relate to the Intensification Planning Instrument (IPI) and associated companion plan changes and give effect to the NPS-UD and RMA.

Plan change number	Purpose	Relevant AUP Chapters in respect of the NoR
PC 78: Intensification	<p>This proposed plan change responds to the government's National Policy Statement on Urban Development 2020 (amended in 2022) and requirements of the Resource Management Act. These mean the council must:</p> <ul style="list-style-type: none"> • enable more development in the city centre and at least six-storey buildings within walkable catchments from the edge of the City Centre, Metropolitan Centres and Rapid Transit Stops • enable development in and around neighbourhood, local and town centres 	<p>Multiple including:</p> <p>Chapter D: Overlays – Natural Resources, Natural Heritage, Environmental Risk, National Grid</p> <p>Chapter H: Zones – Residential Zones</p> <p>Chapter K: Designations (as it relates to being a qualifying matter)</p>

Plan change number	Purpose	Relevant AUP Chapters in respect of the NoR
	<ul style="list-style-type: none"> • incorporate Medium Density Residential Standards that enable three storey housing in relevant residential zones in urban Auckland • implement qualifying matters to reduce the height and density of development required by the RMA to the extent necessary to accommodate a feature or value that means full intensification is not appropriate. 	
PC79: Amendments to the transport provisions	This plan change aims to manage impacts of development on Auckland's transport network, with a focus on pedestrian safety, accessible car parking, loading and heavy vehicle management, and catering for EV-charging and cycle parking.	<p>Chapter E27 Transport: New standards and assessment criteria to address pedestrian safety, accessible car parking, loading and heavy vehicle management, and catering for EV-charging and cycle parking</p> <p>Chapter E24 Lighting: New artificial lighting standards to enhance pedestrian safety and way-finding along private accessways.</p>
PC80: RPS Well-Functioning Urban Environment, Resilience to the Effects of Climate Change and Qualifying Matters	PC 80 integrates the concepts and terms, well-functioning urban environment, urban resilience to the effects of climate change and qualifying matters, into the objectives and policies in several chapters of the Regional Policy Statement (RPS).	<p>Chapter B Regional Policy Statement</p> <p>B2. Tāhuhu whakaruruhau ā-taone - Urban growth and form</p> <p>B7. Toitū te whenua, toitū te taiao – Natural resources</p> <p>B8. Toitū te taiwhenua - Coastal environment</p> <p>B10. Ngā tūpono ki te taiao - Environmental risk</p>

Plan Change 78 is relevant to the land adjacent to Segment 2 of NoR 2 which has a live urban zone and is not yet developed as it means that the prospect of more intensive residential development close to the future transport corridor needs to be considered, given that as noted in relation to noise and lighting that this has not been considered.

6.9 Alternative sites, routes or methods – section 171(1)(b)

The requiring authority does not have an interest in all the land and the effects of the works are likely to be significant. Therefore, an assessment of alternative sites, routes or methods is required. The requiring authority's assessment of alternatives is set out in Appendix A to the AEE. Sections 5.2 to 5.5 of Appendix A to the AEE discuss the nature of the alternative assessment and design refinements that have taken place in relation to NoR 2.

Figure 5-1 of the AEE, outlines the process undertaken through the corridor and route refinement assessment of alternatives.

Based on guidance from caselaw I understand that the issue is whether the requiring authority has adequately considered alternatives, and not whether the 'best' option has been chosen, or that all possible alternatives have been considered. Therefore, the option chosen by the requiring authority is the one that it considers meets the objectives of the requiring authority and the Project. However, the requiring authority does need to ensure that it has considered all reasonable options and has not 'acted arbitrarily or given cursory consideration to the alternatives'¹⁵.

In my/our opinion, the information supplied demonstrates that the requiring authority has satisfied the requirements of section 171(1)(b), in that adequate consideration has been given to alternative sites, routes, or methods of undertaking the work.

6.10 Reasonable necessity for work and designation – section 171(1)(c)

The requiring authority has set out its specific project objectives for NoR 2 in the Form 18 documents and in section 6 , Table 6.1 of the AEE. These are listed in the AEE as follows:

Improves connectivity between and within Drury and Pukekohe.

- Supports Vision Zero and road safety outcomes
- Supports resilience and the existing transport network by providing an additional strategic transport corridor to SH1 and SH22.
- Supports planned urban growth and the future collector network by providing a new corridor for strategic movements between future urban areas.
- Supports travel choice by providing for all modes of transport.
- Contributes to mode shift and the transition to a low carbon transport network by providing for active modes and connections to the future strategic Active Mode Corridor.
- The method of designation is reasonably necessary to achieve the objectives because it enables the identification and protection of the land required for the Project for an extended duration.

The AEE concludes that the designations are reasonably necessary to achieve the project objectives. I agree with this assessment and conclude that the works and designations are reasonably necessary to achieve the requiring authority's objectives.

6.11 Any other matter – section 171(1)(d)

Section 171(1)(d) requires the council to have particular regard to any other matter the territorial authority considers reasonably necessary in order to make a recommendation on the requirement. In this case the non-RMA documents are considered relevant.

The requiring authority states, in Section 12.1 of the AEE, that it considers that there are other matters under s171(1)(d) that are reasonably necessary to make a recommendation on the NoR. The requiring authority has provided an assessment against a range of other legislation, central government and local government plans,

¹⁵ Waimairi District Council v Christchurch City Council C30/1982

strategies and policies in Table 12.1 of the AEE. I generally concur with the assessments and conclusions of the AEE on any other matter and the range of other documents listed.

I consider that the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 NES (Soil) is a relevant other matter that has not been considered or given regard to specifically.

The NES (Soil) provides a nationally consistent set of planning controls and soil contaminant values to ensure that land affected by contaminants in soil is appropriately identified and assessed before it is developed and, if necessary, the land is remediated or the contaminants contained to make the land safe for human use.

In Form 18 the requiring authority has listed resource consent under the NES (soil) as being required but they are not being sought at this time. I have included an advice note in the conditions to ensure this is captured as part of the designation going forward.

I also note that the AEE refers to the Draft Future Development Strategy (FDS) which is considered an 'other matter'. It would be helpful given that the FDS has now been finalised, for the requiring authority to advise if the assessment would change

6.12 Designation lapse period extension – section 184(1)(c)

A 20 year lapse is sought by Waka Kotahi and AT for all of the NoR required to deliver the Pukekohe Transport Network. The need for this in relation to all of the NoRs is explained on the basis that the period allows for the uncertainty in relation to urbanisation and funding timeframes and is necessary because:

- It provides statutory protection of the land required for transport infrastructure to support future growth in a manner that recognises the uncertainty associated with the timing of that growth.
- It supports efficient land use and transport integration by enabling the efficient delivery of transport infrastructure at a time and in a way that is integrated with future urbanisation.
- It provides each Requiring Authority time to obtain funding, purchase the land and design the projects; and obtain the necessary resource consents and other statutory approvals.
- It provides property owners, businesses and the community certainty on where transport routes will be located (i.e., within the designation boundaries).

It is also noted in the AEE that a lapse period is a limit and not a target and that longer lapse periods are not uncommon for large infrastructure projects.

The fact that the majority of the Pukekohe Transport Network (and some of NoR 2 is within the FUZ is also noted in the AEE as essentially a mitigation of any potential blight effect resulting from the extended lapse period as the zone is a transitional zone that anticipates urbanisation and there is already uncertainty. It is also noted that people who move into the area as the FUZ urbanises, will do so with knowledge of where the network will be. The fact that the network is unlikely to be implemented until urbanisation is (at least) confirmed is also noted.

As outlined in section 6.5.15 it would also be helpful to hear from the requiring authority in response to the issues raised on how the impact of the requested 20 year lapse period could be mitigated. Subject to the response and more details on the sequencing / staging of the project and potential changes to the designation conditions I am generally in support of the lapse period sought.

6.13 Part 2 of the Resource Management Act 1991

The purpose of the RMA is set out in section 5(1) which is: to promote the sustainable management of natural and physical resources.

Sustainable management is defined in section 5(2) as:

...managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while –

- (a) *sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
- (b) *safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
- (c) *avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

An assessment under section 5 of RMA is provided in section 13.4 of the AEE. I generally agree with the assessment provided subject to the recommended new/amended conditions and the further information sought in this report.

Section 6 of the RMA sets out the matters of national importance which must be recognised and provided for. An assessment of all of the NoRs required to deliver the Pukekohe Transport Network is addressed in section 13.1 and Table 13.1, of the AEE There is nothing specific terms of NoR 2 that has been addressed. I generally agree with this assessment.

Section 7 of the RMA sets out other matters which shall be given particular regard to. An assessment of all of the NoRs required to deliver the Pukekohe Transport Network is addressed in section 13.2 and Table 13.2 of the AEE. I generally agree with this assessment.

Section 8 of the RMA requires the principles of the Treaty of Waitangi to be taken into account. An assessment is contained in section 13.3 of the AEE. I generally agree with this assessment.

6.14 Conclusions

The requiring authority has lodged NoR2 under section 168 of the RMA for the new Drury – Pukekohe Link.

I consider that subject to the provision of the requested information set out in this report that it is recommended to the requiring authority that NoR 2 should be confirmed subject to conditions and with modifications, for the following reasons:

- The notices of requirement and associated works are reasonably necessary for achieving the objectives of the requiring authority.
- Adequate consideration has been given to alternative sites, routes or methods of undertaking the work identified in the notices of requirement.
- The notices of requirement are generally consistent with the relevant aup provisions.
- The notices of requirement are generally in accordance with part 2 of the rma and; and relevant national environmental standards and national policy statements.
- Restrictions, by way of conditions, imposed on the designation can avoid, remedy or mitigate any potential adverse environmental effects.

6.15 Recommendation and conditions

6.15.1 Recommendation

Subject to new or contrary evidence being presented at the hearing, it is recommended that the notices of requirement be confirmed by the requiring authority, subject to the amended and additional conditions, set out in Attachment 5 to this report.

That pursuant to section 171(3) of the RMA the reasons for the recommendation are as follows:

- The notice(s) of requirement are consistent with Part 2 of the RMA in that it enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety.
- The notice(s) of requirement are consistent with and give effect to the relevant national environmental standards, national policy statements and the AUP.
- In terms of section 171(1)(b) of the RMA, adequate consideration has been given to alternative sites, routes or methods for undertaking the work.

- In terms of 171(1)(c) of the RMA, the notice(s) of requirement is reasonably necessary to achieve the requiring authority's objectives.
- Restrictions, by way of conditions attached to the notice(s) of requirement have been recommended to avoid, remedy or mitigate adverse environmental effects associated with the works.

6.16 Recommended conditions

The conditions set recommended by the reporting planner for NoR 2 are set out in Attachment 5 to this report.

7 NoR 8 Mill Road and Pukekohe East Road Upgrade (AC)

7.1 Proposal - Form 18¹⁶

Waka Kotahi is proposing to upgrade 2.1 km of Mill Road and 3.4 km of Pukekohe East Road and has submitted a NoR to designate an area of land of approximately 11.7 hectare. The works run from the Bombay Interchange at SH1 along Mill Road to just west of Runciman Road.

The proposed work is for the construction, operation, maintenance and improvement of a state highway and cycleway and / or shared path, and associated infrastructure on Mill Road, Bombay and Pukekohe East Road, Pukekohe.

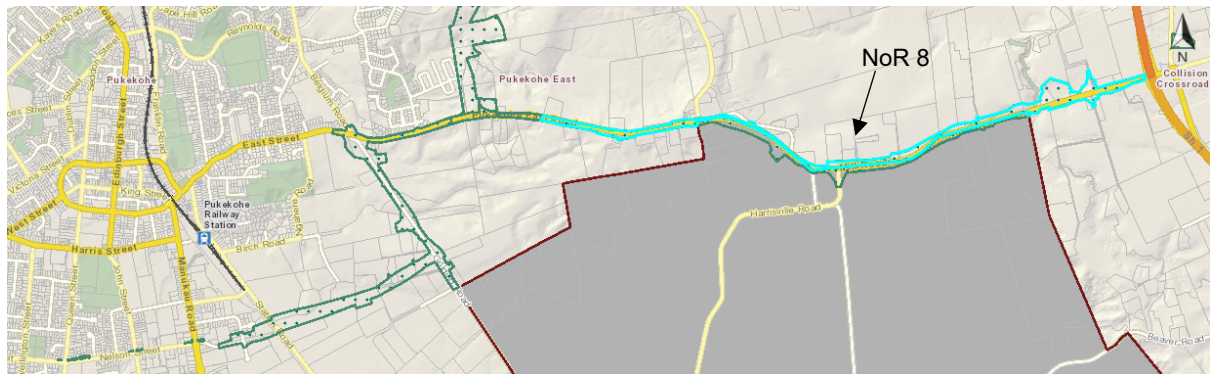


Figure 7-1 NoR 8 – Mill Road and Pukekohe East Road Upgrade and other NoRs and (sourced from Auckland Council Geomaps).

As shown in Figure 7-1 above the NoR extends from SH1 to Pukekohe East Road where it meets Auckland Transport's NoR 4 (Pukekohe South-East Arterial). An NoR has been lodged with WDC to designate land to the south of centre line of Mills Road and Pukekohe East Road located in WDC.

Waka Kothai is requesting a 20-year lapse period.

The project objectives are:

Provide for an upgrade transport corridor from SH1 (Bombay Interchange) to Pukekohe that:

- g. Improves connectivity
- h. Is safe
- i. Provides resilience in the transport network
- j. Integrates with and supports planned urban growth
- k. Integrates with and supports the existing and future transport network
- l. Improves travel choice and contributes to mode shift

¹⁶ Form 18 Notice Of Requirement For A Designation Of Land Waka Kotahi New Zealand Transport Agency NoR 8 (AC) – Mill Road and Pukekohe East Road Upgrade dated 2 October 2023

The designation footprint includes provision for:

- A state highway with a shared path;
- Associated works including intersections, bridges, embankments, retaining, culverts and stormwater management systems;
- Changes to local roads, where the proposed work intersects with local roads; and
- Construction activities including construction areas and the re-grade of driveways.

Proposed conditions are included with the Form 18 Notice. These conditions are common to both of Waka Kotahi's NoRs except in relation to Condition 24 (Tree management Plan).

The main components of the proposed designation are summarised below.

- 2.1km of Mill Road is proposed to be upgraded to from SH1 in the east to Harrisville Road in the west, with an indicative 30m wide cross section with four lanes for general traffic, with walking and cycling on the southern side, shown in Figure 9-26 of the AEE.
- Pukekohe East Road is proposed to be upgraded (3.4 kms) for active transport facilities with a 6m wide shared cycle and walking path on the southern side from Harrisville Road in the east to NoR 5 in the west shown in Figure 9-37 of the AEE.
- One new stormwater wetland, swales and new and upgraded culvert.

7.2 Affected land

The requirement is described in the Form 18 Notice applies to 52 land parcels (excluding existing roads). The works intersect with Runciman Road and two ends of Morgan Road on the northern side of the NoR and with Harrisville Road on the southern side of the road. It is noted that while Turbott Road clearly linked with Pukekohe East Road in the past, the connection is no longer formed (a side barrier runs across the previous connection with Pukekohe East Road).

The amount of land required on each of these land parcel as shown in Form 18 Attachment B: Schedule of Directly Affected Properties ranges from 18,130m² at 165C Mill Road (the largest) to 46m² at 180B Mill Road. The directly affected land is in one of five zones: Business - Neighbourhood Centre Zone, Open Space – Conservation, Rural – Mixed Rural, Rural – Rural Production zone and Future Urban.

The affected land is identified in the designation plans that are provided in Form 18 Attachment A: Designation Plans and the schedule of directly affected properties provided in Form 18 Attachment B: Schedule of Directly Affected Properties. The directly affected land is required for the project and associated works.

The table in section 9.13.2 of the AEE notes that the land use of the directly affected land includes agricultural land (predominantly pastoral, with some arable to the east) with rural residential properties located along the road corridor and within the immediate rural setting. The following existing dwellings are located within the designation footprint¹⁷ :

- 28 Mill Road,
- 87 Mill Road,
- 155 Mill Road⁰
- 182 Mill Road
- 306 Pukekohe East Road

7.3 Site, locality, catchment and environment description

A description of the receiving environment and the works on land directly affected by the designation is contained in the AEE and within each of the technical assessments which should be read in conjunction with this report.

¹⁷ Table 4-1 Pukekohe Transport Network – Assessment of Construction Noise and Vibration Effects

In relation to the approach to assessing the likely receiving environment, section 8.4 of the AEE outlines that assessing the effects on the environment as it exists today will not provide an accurate reflection of the environment in which the effects of the construction and operation of the transport corridor will be experienced. Therefore, the AEE sets out today's land use, zoning type, likelihood of change for the environment (ranging from low to high) and the likely future zoning that relates to those areas subject to the Future Urban zone.

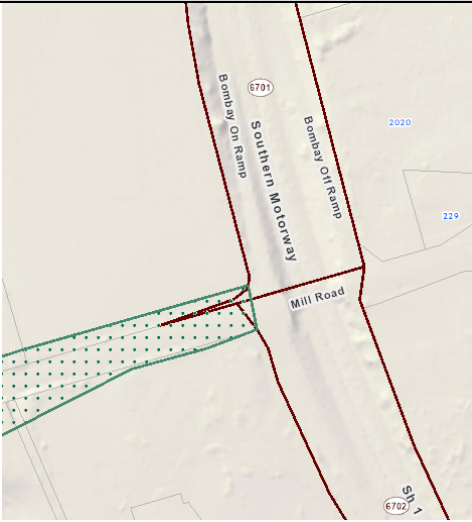
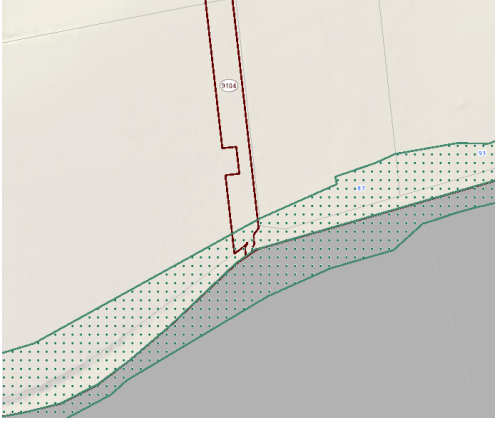
NoR 8 is partly located on land that is part of the Pukekohe East tuff ring (subject to the Outstanding Natural Features Overlay in the AUP). It is located in the catchment of three streams, the Ngakoroa, Whangapouri and Tutaenui Streams. NoR 8 also traverses a two overland flow paths that appear to be branches of the Ngakoroa Stream and already have culverts constructed under the existing road. one is located at Morgan Road and there is a stream shown running beside Mill Road from 105 Mill Road that then travels to the north between 139A and 155 Mill Road flowing the Open Space – Conservation zoned land located on the northern side of NoR 8.

At the eastern end of Mill Road the NoR applies to Business Zoned land adjacent to SH1 (at the Bombay Service Centre with BP, McDonalds and other eateries). The bulk of the route has rural zones applied apart from the western end where there is FUZ land on the southern side of Pukekohe East Road. The Pukekohe East Community Centre with tennis courts is located on the northern side of Pukekohe East Road on the western side of Runciman Road.

The current road is a two lane carriageway.

7.4 Other designations, notices of requirement, and consent applications

The land within or adjoining the NoR is subject to a number of existing designations, and notices of requirement as summarised in section 9.13 of the AEE. The table below summarises those related to NoR 8.

Project	Interface with NoR 8	Status
Waka Kotahi SH1 Designation 6702 – located at the eastern extent of the project.		The Waka Kotahi designation is the primary designation
First Gas designation 9104 – Pukekohe to East Tamaki Gas Pipeline		The First Gas designation is the primary designation
Plan Change 78 (PC78)	NoR 8 interfaces with the Business – Neighbourhood Centre zone land located at 216 Mill Road beside SH1 that is subject to PC78.	This plan change has been notified and although hearings have commenced no decision has been released.

As identified in section 9 of the AEE there are a number of developer-led plan changes, resource consents and developer interest in Pukekohe in proximity to the Pukekohe Transport Network.

7.5 Effects on the environment

Effects on the environment are addressed in section 11 of the AEE. The following discussion addresses effects in the same order they are addressed in the AEE with additional matters included at the end. The relevant specialist reports are referred to and are included in Attachment 3. Submissions have also been considered and are referred to where relevant. These should be read in conjunction with this report.

7.5.1 Effects to be disregarded - Trade competition

We do not consider that there are any trade competition effects.

7.5.2 Effects that may be disregarded – Written approvals

No written approvals were included with NoR 8.

7.5.3 Positive effects

Requiring Authority AEE

The AEE describes the positive effects and outcomes that the Pukekohe Transport Network as a whole will provide. These are related primarily to transport and include:

- Improved safety, and consequential reductions in the risk of Death or Serious Injuries (DSI's) for all road users.
- Improvements to walking and cycling facilities
- Improvements to public transport facilities (connecting to key rapid transit stops); and
- Improvements to general traffic and freight (including increased connectivity, capacity, safety and resilience of the network) will provide the following benefits.

Specialist Review

Wes Edwards of Arrive Ltd has reviewed the transport assessment and notes that the Projects collectively are intended to accommodate the increased demand for travel generated by the growth expected to occur in the southern Auckland and northern Waikato regions while addressing some of the adverse effects of that increase. He notes that for that reason alone the Projects have significant benefits.

The review also notes that the assessment material provided by SGA evaluates the benefits of the Projects assuming that all development would occur with or without the Projects however Wes Edwards is of the view that much of the development is unlikely to occur without the Projects, which has not been accounted for in the ATE benefits analysis, although the interplay is acknowledged. He points out that the benefits attributed to the Projects may not all occur unless all of the planned growth also occurs and will be less than expected in a partial implementation situation.

Planning Review

I consider that the proposed works enabled through NoR 8 will have significant positive transport effects for the reasons outlined in the AEE.

The positive community effects are similar to the transport effects and I agree with the AEE in terms of these.

As noted earlier in Section 6 in relation to NoR 2 the positive terrestrial ecology effects identified in the AEE appear to be largely related to future regional consents required for stormwater discharge, earthworks and vegetation removal and works affecting streams and wetlands and will be mitigating the effects of the physical works. As outlined in the AEE and the Assessment of Ecological Effects¹⁸ specific assessments of the current conditions along the route have not been undertaken in relation to the current conditions of the ecological values present.

There are a number of matters listed under Landscape and Visual that are also linked to urban design benefits that I agree will be positive effects and contribute to the creation of an appropriate future urban environment however this only applies to the western end of NoR 8. The benefits in the case of NoR 8 are largely achieved through the loss of the frontages of properties including existing frontage planting.

The Project Description for NoR 8 as set out in Schedule 1 of Form 18 is:

¹⁸ Pukekohe Transport Network - *Assessment of Ecological Effects* September 2023 prepared by Ian Bredin, Sahar Firoozkoohi

“The proposed work is the construction, operation, maintenance and improvement of a state highway and cycleway and / or shared path, and associated infrastructure on Mill Road, Bombay and Pukekohe East Road, Pukekohe. The proposed work is shown in the following Concept Plan (Figure 1) and includes:

- A state highway with cycleway and / or shared path.
- Associated works including intersections, bridges, embankments, retaining, culverts, stormwater management systems;
- Changes to local roads, where the proposed work intersects with local roads; and
- Construction activities including construction areas and the re-grade of driveways.

The Concept Plan in Form 18 has little detail although there is also a requirement to deliver a concept plan under condition 10(f)

Therefore, the conditions are very important in delivering the positive effects identified as well as the mitigations.

The relevant condition in relation to many of these positive effects is Condition 10 related to the provision of the Urban and Landscape Design Management Plan (UDLPM) which uses ‘where appropriate’ and ‘where practicable’ (both appear three times) without reference to how this will be determined. Condition 24 related to the provision of a Tree Management Plan is also important in relation to the benefits.

I agree in general with the assessment of the positive effects of the NoR but think that changes to Condition 1 may be needed given the limited detail in the concept plan.

7.5.4 Effects on Māori culture, values, and aspirations

Requiring Authority AEE

As discussed in Section 6.6.4 in relation to NoR 2, the AEE notes that a Cultural Values Assessment was received from Ngāti Te Ata Waiohū to inform the options assessment and a CIA from Ngāti Te Ata Waiohū to inform the concept design and AEE.

No identified properties or land currently being negotiated under Treaty settlements, land returned under a Treaty settlement, marae, Māori freehold lands, Tupuna Maunga Affected Areas, Tangata Whenua Management Areas, Sites of Significance under the: AUP are directly affected.

The AEE notes that much of the Network is within the Ngāti Tamaoho statutory acknowledgement area, and that Waikato Tainui advised they defer to Ngāti Te Ata Waiohū, Ngāti Tamaoho and Te Ākitai Waiohū for NoR 8 Mill Road-Pukekohe East Road Upgrade.¹⁹

The AEE notes that the key matters raised by Mana Whenua relate to impacts on streams and ecology, impacts on tuff rings, hills and landscapes, cultural heritage and sites of cultural significance, growth in rural areas, support for the future transport network, and socioeconomic wellbeing.

The AEE notes that the CIA identifies the potential for adverse impacts on freshwater systems and receiving environments and that the CIA identified opportunities for riparian planting alongside the streams to restore and regenerate the environment and increase wetland areas as part of the Project. Improvement of water quality and the importance of the streams and wetlands mauri were also identified. A preference of bridges instead of culverts to enable fish passage and concerns relating to native bats, lizards, birds and fish was also identified.

The Pukekohe Transport Network widens only to the south on Pukekohe East Road (NoR 8) to reduce impacts on the Pukekohe East Tuff Crater. The AEE noted that this was discussed with Mana whenua throughout the options assessment and concept design processes. Additionally, these features will be considered further with Mana whenua at future design stages of the project. In particular, opportunities to recognise the cultural significance of the Pukekohe East tuff crater (ONF) through the Cultural Advisory Report and ULDMP / Landscape Management Plan that are conditions for NoR 8.

¹⁹ Section 11.3.1 of the AEE.

Several conditions are proposed which were collaboratively developed with Mana Whenua. These conditions include inviting Mana Whenua to prepare a Cultural Advisory Report (proposed condition 9), to participate in the development of the Urban and Landscape Design Management Plan (ULDMP) (proposed condition 10), and prior to the start of construction works or enabling works Mana Whenua will be invited to prepare a Cultural Monitoring Plan (proposed condition 15).

Planning Review

It is noted that NoR 8 cuts through the Oira, the Ngaakooroa and the Whangapouri stream catchments which flow into Pahurehure Inlet and ultimately Manukau Harbour.

NoR 2 is not within any 'Sites and Places of significance to Mana Whenua' as identified on the AUP's planning maps. There are no known archaeological sites identified within the NoR area.

No specialist review has occurred as the CIA was not provided and it is assumed It is noted that no submissions have been received from Mana Whenua groups in relation to the NoR. A submission was received from Heritage NZ Pouhere Taonga (HNZPT) and is discussed in section 7.6.12 below.

7.5.5 Traffic and Transport Effects

Requiring Authority AEE

The speed limit on this route is proposed to be 80km/h. The stated intent is to improve safety, capacity, and travel choice on this corridor. Active mode paths on the southern side of Pukekohe East Road. No changes are proposed to the carriageway or the northern side of the road.

A proposed dual-lane roundabout at the intersection with Harrisville Road and widening of the carriageway to four lanes east of Harrisville Road requires additional land on the northern side of this section. Land on the southern side of the road is also required east of the regional boundary.

A new dual-lane roundabout is proposed approximately 400m west of the Bombay Interchange, and two side connections to this roundabout would provide for some combined property accesses. This roundabout and the access formation requires land on both sides of the road. The Project ends a short distance east of this roundabout where it is proposed to tie in with the SH1 Papakura to Bombay project which is expected to provide a four-lane cross-section through to the Bombay Interchange.

The Assessment of Traffic Effects expects that all properties on Pukekohe East Road would be retained, although some may need to be regraded. The AEE notes that where existing properties will face a diversion impact given that only a left-in and left-out access will be permitted, the engineering design has taken this into account and included new turning facilities to minimise the potential adverse effects (e.g., 185 Mill Road, NoR 8).

Effects on traffic and transport are addressed in section 11.4 of the AEE which refers to the **Assessment of Transport Effects**²⁰. The Transport Network Assessment includes a table that outlines the interdependencies between the NoRs, and notes that NoR 8 could be implemented stand-alone to provide for increased capacity and safety on this corridor, although the western end of the corridor may experience increased volumes on the existing alignment leading to poorer safety outcomes, so the benefits would be improved with NoR 4 and / or NoR 5 in place.

The positive operational effects for NoR 8 relate to safety, walking, cycling, general traffic, freight and there is a minor positive effect in terms of property access which is also considered to have some adverse effects that will need to be managed.

The AEE also covers construction effects which relate to traffic routing, property access, pedestrian and cyclist safety, road safety, on-street and public parking, parallel construction of projects and land use activities that will require further consideration. It is recommended that a Construction Traffic Management Plan (CTMP) be

²⁰ Prepared by Subha Nair / Deborah Keary / Sharath Kotha

prepared prior to the start of construction for each stage of the work, this is included as proposed condition 17. The technical report recommends that if required, Site-Specific Traffic Management Plans (SSTMP) should be developed to manage constraints on access to affected properties.

Specialist Review

Wes Edwards' review of the NoR and Pukekohe Transport Network Assessment of Transport Effects September 2023 (refer Attachment 3) refers to NoR 8 as 8: MPEU. He has noted the location of submitters to this NoR in his assessment.

Mr Edwards notes that he expects the road once it becomes a state highway could become a Limited Access Road (LAR), but those processes would be independent of these NORs. Properties on a LAR can only be accessed through crossing points approved by NZTA under the Government Rounding Powers Act 1989. He also notes that median barriers, median islands, or side barriers on any road following consultation with affected parties. Medians may prevent right turns in and out of properties and some side roads, and due to the inconvenience caused these treatments are generally only implemented on existing roads in order to address a significant safety issue. He notes that all property must have legal access. Given the potential impact of changes to property access arrangements he considers it is important that the conditions for the designations address this matter comprehensively. He points out that the impact of the restriction on right turns in terms of additional journey time may not be known as the Assessment of Transport Effects also suggests that in many cases the decision on the form of intersection control (give way, roundabout, or traffic signals) will be made during the detailed design and OPW stage.

He notes that the existing sections of road in the rural areas generally have no parking restrictions, although these roads have relatively narrow shoulders with little opportunity for parking. He notes that some properties proposed to be designated have parking or loading areas located in the affected areas, and the ultimate removal of the designated land may also result in parking or loading areas outside the designation being affected by changed access or manoeuvring geometry. He points out that the impact of this has not been assessed in the Assessment of Transport Effects. This impact appears to be the worst at the eastern end of NoR 8, but it would be useful to have this confirmed by the requiring authority.

Mr Edwards has reviewed the submissions as outlined and does not support Submission 3, 8 or that part of Submission 16 from the Campaign for Better Transport that expresses the view the kerbside lanes could be restricted to heavy goods vehicles (trucks) and/ or higher-occupancy vehicles, a T2 lane for example. He notes that submissions 1 (A van Schalkwyk) and 17 (H Singh) are concerned about property access to sites on the northern side of Mill Road that share a common access located approximately 150m west of the proposed roundabout at the eastern end of this project. Mr Edwards has outlined how he would expect that the right turn movements to the sites would operate and that he thinks the manoeuvre will be safe and it would be helpful of the requiring authority could confirm the situation.

Submissions 4 (Maimere Properties, 197 Pukekohe East Road) and 5 (M and L Johnstone and Williams, 197 Pukekohe East Road) were also reviewed by Mr Edwards. He notes that they request the property access is relocated to provide safe access, and that the speed limit be lowered. He notes that changes to the geometry of the traffic lanes are not proposed and that changes to speed limits are made through a different process, and the property owner could pursue a safer access location at any time. He does not support either submission point.

The Ministry of Education requests changes to the CTMP to address potential effects on existing and future schools located near to the Project related to traffic, noise and other nuisance effects arising from future construction works. This issue is discussed in more detail below although it is noted that Mr Edwards supports that submission point.

Planning Review

The positive operational benefits assessed in the AEE as arising from NoR 8 are related to the delivery of the safety improvements along the route and provision for active modes. These benefits are supported by the Campaign for Better Transport and by Anthony van Schalkwyk (safety for traffic turning into 165 Mill Road).

Condition 10 related to the ULDMP as proposed is focused on integration with the adjacent existing or proposed urban context. While there is a clear process for this land to be included in the RUB it does beg the question -

should this condition be amended to deal with rural land as well and if not, what approach is proposed to manage this? As with NoR 2, it would be helpful to hear from the requiring authority on this.

It is noted that the Transport assessment is based on the growth anticipated in the Future Urban Land Supply Strategy (FULSS) 2017. The AEE (Section 3.3) notes that at the time of drafting the AEE the draft Future Development Strategy (FDS) had been released and that it was expected to be finalised later in 2023. This has been finalised and it would be beneficial to understand what changes if any have been made in relation to the Project Area and the implications in terms of the timing of projects – given the comments in the AEE.

In terms of the submissions to the NoR in opposition a number are specifically concerned about access to their sites. The transport benefits for the land immediately adjacent to the NoR 8 route in the FUZ will be realised although the sites are not going to be able to directly access Pukekohe East Road as they will be directed to new local roading within developments²¹. The AEE notes that the rural sites will be able to rely on their existing access although it is assumed that they will need to be altered to accommodate the left in left out turns as the wire median barrier shown in the cross section in Figure 9-35 in the AEE will not allow right turns.

The Ministry of Education (submission 14) has submitted in relation to the potential effects of construction traffic from future construction works of the transportation network being delivered through NoR 2 and the other Notices of Requirement on existing schools, or any future schools developed in this area. The Ministry is seeking to changes to conditions to ensure that appropriate conditions are included in the designations to mitigate any adverse effects associated with the construction of the Pukekohe transport network. These changes are discussed in more detail in section 6.7.13 below. It is noted that the closest schools to NoR 8 are at Bombay on the eastern side of SH1 or in Pukekohe. While it is noted that Mr Edwards supports the submission it would be helpful if the submitter could outline any particular concerns in relation to NoR 8.

It would be helpful for the requiring authority to provide a response at the hearing on the matters raised by submitters both in terms of further information and the changes to conditions suggested by submitters and Mr Edwards. I also note in relation to the recommendation in the Assessment of Transport Effect that there is no condition related to the development of Site-Specific Traffic Management Plans (SSTMP) should be developed to manage constraints on access to affected properties. There is no condition addressing this in the designation. It would be helpful to understand if this is an oversight. I consider that the potential adverse traffic and transport effects can be avoided, remedied, or mitigated, subject to the above, and the proposed conditions as recommended to be amended.

7.5.6 Construction Noise and Vibration Effects

Requiring Authority AEE

Effects on construction noise and vibration are addressed in section 11.5 of the AEE which refers to the requiring authority's technical report Pukekohe Transport Network Assessment of Construction Noise and Vibration Effects September 2023 by Joshua Dunkel, Siiri Wilkening and Claire Drewery.

Section 4.4 notes that it is expected that the majority of the works which is likely to be more than 20 weeks in duration will be carried out between 7am – 6pm Monday to Saturday. There may be extended hours during summer earthworks season (e.g. 6am to 8pm, Monday to Sunday), there is also the possibility of night works for critical activities (culvert construction and road surfacing).

A list of receivers is provided for NoR 8 where construction noise levels are predicted to exceed 70dB LAeq in Appendix A to the Assessment of Construction Noise and Vibration Effects. It is understood that 70dB LAeq is selected as it is the "long-duration" noise criteria at noise sensitive receivers, and other levels are 85 dB LAFmax during the daytime, 45 dB LAeq during the night-time and 55 dB LAeq during the daytime on Sundays and public holidays.

Relevant to the discussion about NoR's construction noise and vibration is the approach to the likely receiving environment at the time of construction. In terms of existing receivers, the assessment notes in section 6.2.8.1

²¹ Section 11.15.1 of the AEE.

that there are around 41 existing receivers that could experience noise levels that exceed the daytime noise criterion without mitigation and that some could receive noise effects where the daytime criteria could be exceeded without mitigation. Even with mitigation in place a small number of existing dwellings are likely to receive noise that exceeds 85 dB LAeq for brief periods when works are immediately adjacent. If a critical activity has to be carried out during the night-time in close proximity to residential receivers, consultation and mitigation measures will be essential.

For most works and most of the overall construction duration, noise levels are predicted to comply with the 70 dB LAeq noise limit. The construction work involves widening of the road. Most of the existing receivers are identified as being residential type structures and where vibratory rolling is proposed to occur in close proximity to houses, the Category B vibration criteria are predicted to be exceeded.

Implementing noise management and mitigation measures via a CNVMP is identified as the most effective way to control construction noise and vibration impacts.

The zones applying to the land in Auckland are Business - Neighbourhood Centre Zone, Open Space – Conservation, Rural – Mixed Rural, Rural – Rural Production zone and Future Urban. The assessment notes that any future buildings will need to be assessed at the time of construction and mitigation and management determined through the CNVMP.

Specialist Review

The review by Rhys Hegley from Hegley Acoustic Consultants notes that the assessment of construction noise effects has little information on the actual predicted level of noise/ vibration with no indication as to the actual level expected by the receiver. He suggests that it would be useful to have more information on the bandwidth used in Table 6-1 of the Assessment of Construction Noise and Vibration Effects. He has similar concerns about the limited information about the vibration levels at each building as outlined in Section 3.3 of his memo.

He notes that the use of a CNVMP is a best practice response but considers that a 10dB reduction from a barrier proposed to control construction noise will be difficult to achieve and wonders if noise barriers that are proposed for operational noise could be built before construction.

He is also concerned at the potential for night works to be used as a means of meeting a construction programme deadline.

He has not seen the need to respond to specific submissions relating to construction effects as they were general in nature.

He has recommended changes to the construction noise and vibration conditions submitted with the NoRs.

Planning Review

Construction phases for each of the Projects as noted in section 4.4 of the Assessment of Construction Noise and Vibration Effects are expected to occur for a minimum of 12 months. The duration of works shown in Table 8-2 of the AEE for NoR 8 is 3 to 4 years. While the management of construction noise through CNVMP is a common requirement for works in the road it is noted that long duration projects do require careful management to ensure effects on individual receivers are minimised.

A number of submitters have raised concern about the impact of construction noise on their property and amenity (Submissions 4 and 5 in relation to 197 Pukekohe East Rd; Submission 8 in relation to 100 Pukekohe East Rd; R Cunningham in relation to 80 Mill Rd). 197 Pukekohe East Rd is in the Rural Mixed zone, 100 Pukekohe East Rd is in the FUZ and 80 Mill Road is in WDC.

Having more information about the noise levels predicted for the specific sites and the duration of the works could be helpful in terms of determining the adequacy of the conditions as proposed.

The Ministry of Education (submission 14) is also concerned about noise effects of construction on existing schools, or any future schools developed in this area. The nearest existing schools are in Bombay and Pukekohe so it is assumed that the concern is related to construction traffic moving past the schools. It would be useful to have this clarified.

Changes to conditions to ensure that appropriate conditions are included in the designations to mitigate any adverse noise effects associated with the construction activities. It would be helpful for the requiring authority to provide a response at the hearing on the matters raised by submitters and by Mr Hegley as it is not clear at this time that the potential adverse construction noise effects in particular can be avoided, remedied, or mitigated.

7.5.7 Operational Noise and Vibration Effects

Requiring authority AEE

Operational Noise Effects are addressed in section 11.6 of the AEE. Table 11-1 in section 11.6.1 of AEE notes that there are 22 existing Protected Premises and Facilities (PPFs) but that half of NoR 8 involves only active mode upgrades of the existing road, which does not cause elevated noise levels and no PPFs were assessed adjacent to the active mode upgrades. The current road surface is noted as being chip seal. The noise level was assessed in the Assessment of Operational Noise Effects (section 6.8.1) and existing noise levels noted as being generally in the 50 to 60 dB LAeq(24h) band, with only three PPFs predicted to receive noise levels in Categories B and C and the levels predicted to rise with traffic growth. The presence of SH1 is noted as having an impact on the ambient noise level for PPFs at the eastern end of the corridor.

It is also noted that NoR 8 Mill Road – Pukekohe East Road Upgrade provides for upgrades to Mill Road, which is a relatively busy road in a rural environment from 2 lanes to four from SH1 in the east to Harrisville Road in the west. The project involves an altered road.

The Project proposes to upgrade the road surfacing as part of widening the road (assumed to be PA10 30mm (a porous asphalt surface) in the Assessment of Operational Noise Effects (section 6.8) , which will result in a slight improvement in noise environment for some existing PPFs. Noting that the Assessment of Operational Noise Effects notes in Table 4-1 that 28, 87, 155, 182 Mill Road and 306 Pukekohe East Road were not assessed as the buildings are inside the designation.

Where the widening brings the road closer to PPFs (particularly at the new roundabout beside 182 Mill Road), noise levels were predicted to increase up to 5 dB. Most PPFs will receive noise levels in Category A. Section 11.6.3 of the AEE notes that for NoR 8, with the mitigation of barriers for four houses, most PPFs are predicted to receive noise levels in Category A and for two PPFs Category B.

The key thing to note is that the Assessment of Operational Noise Effects (section 6.9) notes that the low noise road surface will normally be laid within the first 12 months of opening of a road. This allows the road (particularly new roads) to settle so that the low noise road surface does not crack or warp. This means that for the first few months after opening, a noisier road surface is laid, such as chip seal. The assessment notes that the effect is temporary.

The AEE notes that prior to construction, mitigation measures will be reassessed to confirm the best practicable option for the PPFs that are predicted to receive noise levels above Category A.

Specialist Review

The review by Rhys Hegley from Hegley Acoustic Consultants of the Assessment of Operational Noise Effects covers a range of matters. He points out that there is a difference in approach between the construction noise assessment and the operational noise assessment in terms of dwellings built between the time of designation construction. The rationale is due to the definition of PPF in NZS 6806: 2010 Acoustics - Road-traffic noise - New and altered roads (NZS 6086). He points out that the low noise road surface alone may not achieve a reasonable level of noise for these future dwellings and that while there is logic to leave it to those developing the future dwellings to incorporate their own mitigation there is no method by which those building houses prior to the road's construction can determine the noise the house would be exposed to.

He notes two methods to address this. Either to amend the definition of PPF to include that that arrive up until the final design is done or require future developers to provide the mitigation with the noise levels provided for either in the AUP or in the designation conditions (currently the existing PPF are shown in the conditions). He recommends including an amended PPF definition in the conditions.

He suggests that barrier mitigation has the potential to be effective at controlling road traffic noise, particularly to the as yet undeveloped Future Urban Zone (FUZ). He points out that while barriers are not precluded in the current conditions they are not encouraged and recommends the form of a condition to this effect.

Rhys Hegley also outlines the need for certainty in relation to the noise level that PPFs could experience in the conditions.

He supports condition 26 in relation to the road surface but suggests that the conditions allow such elevated levels for 12 months but notes that elevated must increase the risk of disturbance to neighbours, particularly those exposed to the higher levels.

He summarises the range of predicted noise levels in relation to NoR 8 as 48 - 66 dB $L_{Aeq(24\text{ hr})}$

He points out that with some PPF will receive predicted noise levels at the upper end above 55 dB $L_{Aeq(24\text{ hr})}$.

Operational vibration is not considered an issue and he has not seen the need to respond to specific submissions relating to operational effects as they were general in nature.

Planning Review

NoR 8 is to deliver an altered road, and it is recognised that the proposed road surface will result in benefits once finally delivered but clearly this could be some time away given the 20 year lapse period. It is suggested that the new roundabout will result in noise levels potentially increasing up to 5 dB (near 182 Mill Road) which according to the graph in Figure 6-16 of the Assessment of Operational Noise Effects is noticeably louder.

An understanding of the likely location of permanent noise barriers where the low noise road surface is expected to be insufficient would be helpful.

It would be helpful for the requiring authority to provide a response at the hearing on the matters raised by submitters and the changes to conditions outlined by Rhys Hegley to ensure that the potential adverse operational effects in particular can be avoided, remedied, or mitigated.

7.5.8 Construction Flood Hazard Effects

Requiring authority AEE

The AEE notes that there may be flood hazard effects during the construction phase and describes in Section 11.7.1 the types of hazards that may occur as a result of specific construction activities. These activities and/or the effect include:

- Disrupting natural drainage patterns with removal of vegetation;
- Changes to existing stream crossings / new stream crossings
- New attenuation wetlands or upgrading of existing attenuation wetlands
- Blocking overland flow paths or altering overland flow paths due to construction related activities (laydown and construction areas and recontouring)

The AEE notes that the works are expected to be able to be undertaken in a way that will appropriately manage the risk, and this can be defined through flood risk mitigation measures that are included in the Construction Environmental Management Plan (CEMP) provided for in the designation conditions offered.

Section 11.7.6 of the AEE concludes that flood hazard risks during construction can be adequately managed. Proposed works will be located outside of flood plains and overland flow paths as far as practicable. Where this is not possible, potential flooding effects will be managed through the flood risk mitigation measures set out in the CEMP for existing high flood hazard areas.

Specialist Review

Trent Sunich, the council's Consultant Stormwater Technical Specialist has reviewed the NoR and provided a response which is included in Attachment 3.

He notes that due to the dynamic nature of construction staging it is not typical practice to assess potential flood hazard in the manner undertaken for the permanent operational phase. He points out that a requirement has been included in the NoR conditions for flood hazard assessment during construction (and associated mitigation) as part of the Construction Environmental Management Plan (CEMP). He considers that this proposed approach is satisfactory to assess and or mitigate any temporary flood hazard effects associated with the construction activities. He makes no suggestions in terms of changes to the CEMP conditions.

Planning Review

It is noted that none of the submitters raised concern about flood effects and that the impact of earthworks on flood risk will be considered as part of the regional consent process. Therefore, based on the comments from Mr Sunich I consider that the potential adverse effects on flooding during construction can be avoided, remedied, or mitigated, subject to the above, as the CEMP condition requirement for flood hazard to be assessed during construction and the requirements of the regional consent provisions in the AUP will ensure that this effect is adequately addressed.

7.5.9 Operational Flood Hazard Effects

Requiring authority AEE

Flood hazard risk resulting from the Pukekohe Transport Network as a whole are identified as being the following possible changes to:

- The flood freeboard to existing habitable buildings;
- Overland flow paths and flood prone areas;
- Flood levels on urban land and developable land (in the FUZ);
- The ability to access property by residents and emergency vehicles.

Table 11-2 of the AEE summarises the effect and proposed mitigation for Specific Operational Flood Hazards (from the 100 year ARI flood with a 2.1°C and 3.8°C climate change adjustment to rainfall) of NoR 8 follows:

- NoR 8 upgrades existing roads crosses two flowpaths on Mill Road both serviced by existing culverts. The road widening will not require any culvert lengthening or include any floodplain filling.
- At 155 Mill Road there is moderate (2.1°C) and high (3.8°C) existing and future flooding risks, due to low-lying elevation.

The mitigation proposed is:

- Extend culverts at the same diameter and replace culverts at the same diameter.
- Avoid lifting the crown of the road along Mill Road to prevent adverse effects upstream. Or lowering the road crown to cause effects downstream
- Attenuation for the 10yr and 100yr in the Ngakoroa and Tatuanui Stream catchments

Flood outcomes as for all NoRs are set out in the AEE.

A Flood Hazard condition is proposed which will require the future detailed design of the transport corridors to be designed to achieve specific flood risk outcomes. This includes flood modelling of the pre-Project and post-Project 100 year ARI flood levels (for Maximum Probable Development land use and including climate change). The AEE notes that future detailed design of the alignments will be subject to a separate detailed flood hazard assessment which will refine the design of formations, culverts, bridge crossings and location / size of treatment (attenuation, water quality or both). It also notes that regional stormwater consents will also be required closer to the time of construction.

The AEE proposes that the project (i.e all of the NoR's) be designed to achieve the following flood hazard outcomes:

- No increase in flood levels in a 1% AEP event for existing authorised habitable floors that are already subject to flooding or have a freeboard less than 150mm;
- No more than a 10% reduction in freeboard in a 1% AEP event for existing authorised habitable floors with a freeboard of over 150mm;

- No increase in 1% AEP flood levels for existing authorised community, commercial, industrial and network utility building floors that are already subject to flooding;
- No more than a 10% reduction in freeboard in a 1% AEP event for existing authorised community, commercial, industrial and network utility building floors;
- No increase of more than 50mm in flood level in a 1% AEP event on land zoned for urban or future urban development where there is no existing dwelling;
- No new flood prone areas (with a flood prone area defined as a potential ponding area that relies on a single culvert for drainage and does not have an overland flow path); and
- No more than a 10% average increase of flood hazard (defined as flow depth times velocity) for main access to authorised habitable dwellings existing at time the Outline Plan is submitted. The assessment shall be undertaken for the 50%, 20%, 10% and 1% AEP rainfall events.
- Compliance shall be demonstrated in the Outline Plan, which shall include flood modelling of the pre-Project and post-Project 10% and 1% AEP flood levels (for Maximum Probable Development land use and including climate change).
- Where the above outcomes can be achieved through alternative measures outside of the designation such as flood stop banks, flood walls, raising existing authorised habitable floor level and new overland flow paths or varied through agreement with the relevant landowner, the Outline Plan shall include confirmation that any necessary landowner and statutory approvals have been obtained for that work or alternative outcome.

The AEE concludes in section 11.7.6 that there are potential operational effects risks of increased flood levels upstream and downstream of crossings and where the vertical alignment of the road is elevated. The conclusion is that flood hazard effects can be appropriately managed through the potential management and mitigation measures provided at the future detailed design stage within section 11.7.5 of the AEE that are included as conditions on all of the NoRs.

Specialist Review

Trent Sunich, the council's Consultant Stormwater Technical Specialist has reviewed the NoR and provided a response which is included in Attachment 3.

He notes that the technical assessment has taken that the role at this time is to identify the designation area is sufficient to provide for the alignment construction and operation and any associated works for flood mitigation techniques and that on balance he agrees with the approach. He considers the use of the risk criteria sufficient to identify the quantum of effect that current exists for various properties (particularly in relation to moderate and high-risk areas), and correspondingly that will exist in the future when detailed design is completed via the proposed conditions of the Outline Plan process. He notes that the detailed design process will also capture flood hazard that has not been identified in the flood hazard report but may eventuate as a result of matters such as land use change over the coming decades. Notwithstanding this, he has made various comments in relation to the proposed conditions later in this report.

During pre-lodgement discussions, he notes that he queried whether sensitivity analysis should be completed for a further conservative climate change scenario noting the lapse period for constructing the NoRs is up to 20 years and agrees with the response that additional sensitivity assessments should be undertaken at the resource consent stage especially as flood hazard prediction will continue to evolve. He notes that the proposed NoR conditions need to be sufficiently flexible to accommodate a range of model sensitivity scenarios using the best information available at that time (including more conservative climate change scenarios, if that eventuates). To assist he has recommended changes to the NoR conditions.

Specifically, for NoR 8 he has noted that the NoR alignment follows the existing Mill Road section and crosses two flow paths, both serviced by existing culverts. The road widening may not require any culvert lengthening or include any floodplain filling with the NoR design. However, future designs might require culvert lengthening.

No adverse flood effects are expected from this NoR. Any future designs that may include culvert modification can meet the designation conditions by modelling the effect of the works and oversizing the culvert extension if unacceptable flood effects are found.

He notes that there is a location at 155 Mill Road identified as being a moderate risk with the 2.1° Climate change that is a high risk at the 3.8° change. He points out that the land uses upstream of 155 Mill Road is farmland and floodplain with some dwellings nearby. Future buildings nearby will need to be considered when deciding on an acceptable level of flood hazard change. The downstream building at 155 Mill Road is located at a low elevation and may become flood prone as a result of the NoR 8 project works or as a result of climate change. This culvert crossing will likely not be altered and therefore the effects of lifting or lowering the road crest would have the most significant effect on flood levels. Lifting the road would reduce the freeboard to 144 Mill Road and lowering the road would exacerbate flooding to 155 Mill Road. No change in road crest elevation is therefore recommended to minimise flood effects.

Planning Review

None of the submitters have raised the issue of flooding in their submissions and there is nothing to suggest that the extent of the designation is not sufficient to provide for the alignment construction and operation and any associated works for flood mitigation techniques. Mr Sunich has presumed that Waka Kotahi will prior to the Outline Plan stage review the effects of climate change in terms of the best information available at that time and recommended changes to that effect.

It would be helpful for the requiring authority to provide a response at the hearing on changes to conditions suggested by Mr Sunich and his comments in relation to 155 Mill Road. I consider that subject to the above, and the proposed conditions as recommended to be amended the potential adverse effects on flooding can be avoided, remedied, or mitigated.

7.5.10 Terrestrial Ecological Effects

Requiring authority AEE

Section 11.8 of the AEE discusses the potential ecological effects based on the Pukekohe Transport Network – Assessment of Ecological Effects²².

The effects identified are those which are the subject of district plan controls under the relevant statutory documents and notes that ecological effects that relate to regional plan and / or NES matters will be assessed, mitigation proposed and consented if appropriate through future processes.

The AEE does however point out the positive effects accruing from the proposed Pukekohe Transport Network:

- Improved blue/green infrastructure, such as stormwater wetlands, swales, and associated landscaping (which will include indigenous vegetation) will provide a wide range of ecosystem services.
- Planting on berms, embankments, and stormwater wetlands are connected and
- integrated with retained forest remnants and mature trees, streams, riparian margins, and open space zones.
- Proposed bat mitigation in association with the landscape planting of berms, embankments, and stormwater wetlands is likely to improve ecological connectivity for other native fauna.

Construction related effects are discussed in section 11.8.2 and are described as :

- Disturbance and displacement of roosts / nests and individual (existing) long-tailed bats, avifauna and herpetofauna due to construction activities (noise, light, dust etc that will occur after vegetation clearance (subject to regional consent controls).
- Effects relating to the removal of trees protected as an Auckland district planning matter which is covered under arboricultural effects but is considered low from an ecological perspective

The Assessment of Ecological Effects notes in Table 6-8 that there are 4 streams in the project area, one a permanent stream with high ecological values. 240m of stream loss is identified. 40m of that from the High value permanent stream and 160m from one of the moderate value intermittent streams. Eight wetland areas are

²² Prepared by Ian Bredin and Sahar Firoozkoobi dated September 2023

noted, two of them artificial the other natural inland wetlands as defined in the NPS-FM- all of low to negligible value but 4712m² of wetland loss (619m² is from the artificial wetlands is noted in Table 9-3. There are large trees (in groups and single) that are considered to potentially provide roost for bats.

It is noted in section 11.8.2.2 of the AEE that Bats may be impacted by the removal of vegetation protected by the district plan provisions within NoR 8, and the removal of vegetation within the Waikato section of NoR 8.

The level of disturbance in the case of NoR 8 of disturbance and displacement to roosts and individual bats (existing) assessed before mitigations is considered to be moderate. Section 11.8.3 of the AEE notes that mitigation in the form of pre-construction ecological surveys (Condition 22) and Ecological Management Plans (EMP) that include a Bat Management Plan (BMP) are proposed in places where moderate or higher effects are identified. It is noted that the term Bat Management Plan is not used in the conditions submitted.

The effect with mitigation is considered to be low.

It is noted in section 11.8.2.3 of the AEE that there are a number of Threatened and At-Risk (TAR) bird species and non-TAR bird species likely to be present within the project area and that TAR, and native, birds may also be impacted by removal of district plan vegetation within NoR 8 , through the following effects:

- Disturbance and displacement to TAR and native birds due to construction activities (noise, light, dust, etc.).
- Loss of foraging habitat;
- Nest loss; and
- Mortality or injury to birds

The pre mitigation effects are assessed in Table 11-4 of the AEE as moderate and with mitigation that includes an Avifauna Management Plan (AMP) is recommended as a condition on the proposed designation and the assessment is that with this mitigation in place the effect on TAR bird species will be very low. It is noted that the term Avifauna Management Plan is not used in the conditions submitted.

The AEE notes that only two TAR species of skinks are likely to occur within the project area (copper skinks and ornate skinks). The ecological value of both skinks was assessed as high (At Risk-Declining species), and the magnitude of effects were assessed as negligible in the Auckland Region due to the skinks being considered habitat generalists. The effects resulting from the removal of vegetation NoR 8 is assessed in section 11.8.2 of the AEE as moderate. The potential effects are outlined as disturbance and displacement due to construction activities, and mortality or injury. As such, mitigation is required for the NoR 8 as discussed in 11.9.4. The residual impact is assessed as Low post mitigation.

Operational effects were considered in section 11.8.4 of the AEE. They are considered to be related to:

- Loss in connectivity for indigenous fauna, in particular bats, birds, lizards, associated with light, noise and vibration effects from the operation of the road, leading to fragmentation of habitat; and
- Disturbance and displacement of indigenous fauna and their nests / roosts, in particular bats, birds, herpetofauna, associated with light, noise and vibration effects from the operation of the road.

A Lizard Management Plan is recommended in section 11.8.3 of the AEE as a condition on the proposed designations for NoR 8. However specific conditions are not included.

The level of disturbance and displacement of TAR and native birds, and nest sites due to light, noise, and vibration effects from the operation of the road is assessed as moderate and after implementation of the proposed mitigation (an AMP) the effect is considered low. However specific conditions are not included.

Specialist Review

Simon Chapman (Auckland Council Consultant Ecologist, Ecology New Zealand Limited) has reviewed the NoR and provided a response is included in Attachment 3.

The response does not raise any concerns with the assessment undertaken or the mitigation proposed. He notes that the Assessment of Ecological Effects notes that considers it likely that both copper skink and ornate skink could be found within all NoR and there is potential for Pacific, forest and Auckland green/elegant gecko

within forest stands located in the NoR 8 area, and within the forest stands which border and extend slightly into NoR 4. He points out that lizard management measures are proposed for NoR 8 because part of that NoR falls within the Waikato District, where lizard habitat removal is a District Plan matter.

He considers that Conditions 22 Pre Construction – Ecological Survey and 23 Ecological Management Plan, are likely to adequately manage the potential ecological effects. It is noted that Condition 23(a)(iv)-(v) for NoR 8 include requirements for lizard management, however, within the Auckland Region. It is presumed that the inclusion of this condition is to ensure alignment with any NoR conditions for the Waikato Region.

However, he did note that the majority of the assessment was undertaken prior to the introduction of the National Policy Statement – Indigenous Biodiversity (NPS:IB) and that additional considerations in line with NPS are warranted.

Planning Review

None of the submitters raise Ecological Effects as a concern. However, given the comments made by Mr Chapman about the need to address the NPS- IB it would be helpful for the requiring authority to provide a response at the hearing on this. I consider that the potential adverse effects on flooding can be avoided, remedied, or mitigated, subject to the above, and the proposed conditions as recommended to be amended.

7.5.11 Landscape and Visual Effects and Urban Design Evaluation

Requiring authority AEE

Sections 11. 9.4.8 of the AEE, discusses Landscape and Visual Amenity Effects of NoR 8.

Construction effects are described as being anticipated to be moderate. This is a result of the removal of vegetation, generally limited to roadside planting, lot boundary planting, and parts of some groups of trees. The proposed designation will also extend into the location of the identified Pukekohe East tuff ring (ONF) requiring both cut and fill within this location. Albeit, on the southern side of the existing road only. Earthworks are required due to existing topography.

The visual amenity effects are anticipated to be low-moderate. Where existing planting along the lot boundary / road edge is removed to facilitate the works, rural and commercial properties along Mill Road and Pukekohe East Road will have direct and prolonged views of the construction works, resulting in low – moderate visual amenity effects for those properties immediately adjacent to the alignment. Views from rural residential properties within the wider setting will likely be largely visually contained by the existing vegetation pattern, resulting in low visual amenity effects for those properties within the wider setting, and from public viewpoints.

Operational effects are described as being related to the modification with earthworks (cut and fill) and the change in character and encroachment into adjacent properties with the effects mitigate by planting. It is noted that the majority of the NoR 8 follows along elevated topography including localised ridges / spurs, the southern edge of the Pukekohe East Tuff Ring and broader landscape patterns. As such, the alignment of the designation has a potentially large visual catchment.

With the range of visual effects on public and private viewing locations and audiences, overall, any potential adverse visual amenity effects on private properties are assessed to be low (post mitigation).

Recommended measures to avoid, remedy or mitigate construction effects are related to all of the NoRs. These measures are included in the ULDMP and CEMP (where noted) proposed as conditions.

An Urban Design Evaluation (UDE) is included with the NoR package and is discussed in section 11.15 of the AEE. As noted in the AEE the UDE provides urban design commentary on the concept designs that should be considered in future design stages through the implementation of the Urban Landscape and Design and Management Plan (ULDMP) included as condition 10.

The AEE notes that the urban design opportunities identified could be considered by AT, Waka Kotahi or other parties at future stages of design and development but are not required to mitigate effects of the projects.

Section 11.9.5 of the AEE notes that pest plant and animal management (to support plant establishment) and landscape and visual outcomes for NoR 8 (WDC) will also integrate with NoR (AC) as the Landscape Management Plan (LMP) is required to under the WDC conditions to be appropriately aligned with the ULDMP of NoR 8 (AC).

Specialist Review

Rebecca Skidmore has reviewed the NoR and provided a response which is included in Attachment 3. She notes that the NoRs are supported by robust urban design and landscape analysis. In section 5.6 of her review, she considers that the context of NoR 8 is clearly described in both the UDE and the LVEA.

She notes that the proposed alignment will require land modification and associated vegetation removal to achieve a widening of the existing road corridor. The existing road has established a modification to the underlying landform. This includes the Pukekohe East tuff ring (identified as an ONF within the AUP:OP) that extends to the north and south of Pukekohe East Road and is a distinctive geological and topographical feature. The existing road alignment crosses the southern extent of the ONF overlay. She agrees with the assessment in the LVEA in relation to NoR 8 in relation to the potential landscape effects resulting from the formation of the road within the designation corridor on this feature.

She considers that condition 10's requirements in relation to the UDLMP are suitable and will need to be carefully considered to ensure an appropriate design response is achieved in this area. She agrees with the overall conclusion that moderate temporary adverse effects on the landscape character of the area will result during the construction phase of the project. She does however note that the proposed ULDMP requirements includes Clause (g)(D) "architectural and landscape treatment of noise barriers", and that further analysis of the landscape effects resulting from such structures should be set out in evidence.

She notes that the proposed designation boundary is particularly wide in the area proposed to accommodate the Mill Road wetland stormwater facility. She considers that the wetland stormwater facility, together with associated planting, has the potential to enhance the landscape values of the existing wetland and its relationship to existing vegetation within the Mill Road Esplanade Reserve to the north.

As with NoR 2, Ms Skidmore has noted that there is no Land Use Integration Process (LIP) condition contained in the Waka Kotahi conditions and considers that this would be an appropriate mechanisms to enhance integration between projects.

Planning Review

Given the assessment by Ms Skidmore I consider that the potential adverse effects can be avoided, remedied, or mitigated, however I note that there are potentially four permanent noise barriers proposed. Ms Skidmore has suggested more information on the potential effects on these properties would be helpful.

Given the comments made by Ms Skidmore about the use of an LIP it would be helpful for the requiring authority to provide a response at the hearing on whether this tool could address the submitters' specific site concerns especially where there is an overlap between NoR 8 and AT's projects. I consider that the potential adverse effects can be avoided, remedied, or mitigated, subject to the above information being provided, and the proposed conditions as recommended to be amended.

7.5.12 Historic Heritage and Archaeological Effects

Requiring authority AEE

The AEE relies on the Pukekohe Transport Network Assessment of Effects on Historic Heritage, September 2023 by Matthew Campbell of CFG Heritage Limited submitted as part of the notice of requirement documentation.

Section 11.10.1.1 of the AEE notes that unrecorded archaeological and historic heritage sites may be present within the proposed designation boundaries, in particular near the banks of waterways and they could be impacted by the disturbance or removal of subsurface features and deposits at the construction phase. In

addition, it is noted that no buildings which qualify as definite pre-1900 heritage has been recorded within the designation extent. Section 11.10.1.1 of the AEE also notes that R12/1208 – Bombay Flour Mill (or Pilgrim's Mill) is a recorded historic heritage site adjacent to NoR 8. It is likely the building is south of the designation, but associated features are within the designation. The AEE noted that there are no remains visible on the surface but that it is possible that sub surface remains associated with the mill operation exist which could be unearthed during construction.

An HHMP is recommended to avoid and mitigate potential effects on the Bombay Flour Mill.

No operational effects to either known or unknown historic heritage deposits are noted.

Specialist Review

The council's Senior Specialist: Archaeology, Cultural Heritage Implementation Myfanwy Eaves has reviewed the NoR and provided a response which is included in Attachment 3.

She notes that through the Multi-Criteria Assessment (MCA) process and designing elements away from the historic heritage sites (none are located in or near NoR 2) the impact on known historic heritage has been avoided. She is satisfied that from a historic heritage perspective all matters have been addressed in the technical assessment.

Planning Review

Heritage New Zealand Pouhere Taonga(submission 11) supports "recommendations set out in September 2023 'Pukekohe Transport Network Assessment of Effects on Historic Heritage' and the suite of conditions set out in the 'Waka Kotahi Condition Set Mill Road and Pukekohe East Road Upgrade' are appropriate; supportive of the intended mechanisms through a HHMP condition"

It is noted that Ms Eaves has expressed concern about wording in the Historic Heritage Management Plan (HHMP) condition as submitted where 'unexpected' is used instead of 'accidental' which she prefers. She has also raised concern about the HHMP condition (c) and suggests for clarification the inclusion of more specificity in relation to who has the role of receiving submitted reports. Otherwise, she agrees with the conditions.

Given the comments made by Ms Eaves it would be helpful for the requiring authority and / the submitter to provide a response at the hearing on the changes to conditions suggested. I consider that the potential adverse effects on historic heritage can be avoided, remedied, or mitigated, subject to the above.

7.5.13 Arboricultural Effects

Requiring authority AEE

Section 11.11.1 of the AEE discusses the positive effects of the NoR, noting that the widening of Pukekohe East Road and Mill Road will provide an opportunity to introduce new trees, where the number of trees is currently limited. The overall tree quality and canopy cover will be improved though the implementation of NoR 8, where the current quality of trees is poor and sporadic.

Section 11.11.2.2 notes that construction of NoR 8 may affect fourteen groups of trees that are protected under the AUP district plan provisions. The tree groups are within the Pukekohe East Tuff Crater Outstanding Natural Feature (ONF) overlay or are listed as notable trees in Schedule 10. The extent of the ONF is shown in Figure 7-3 below.

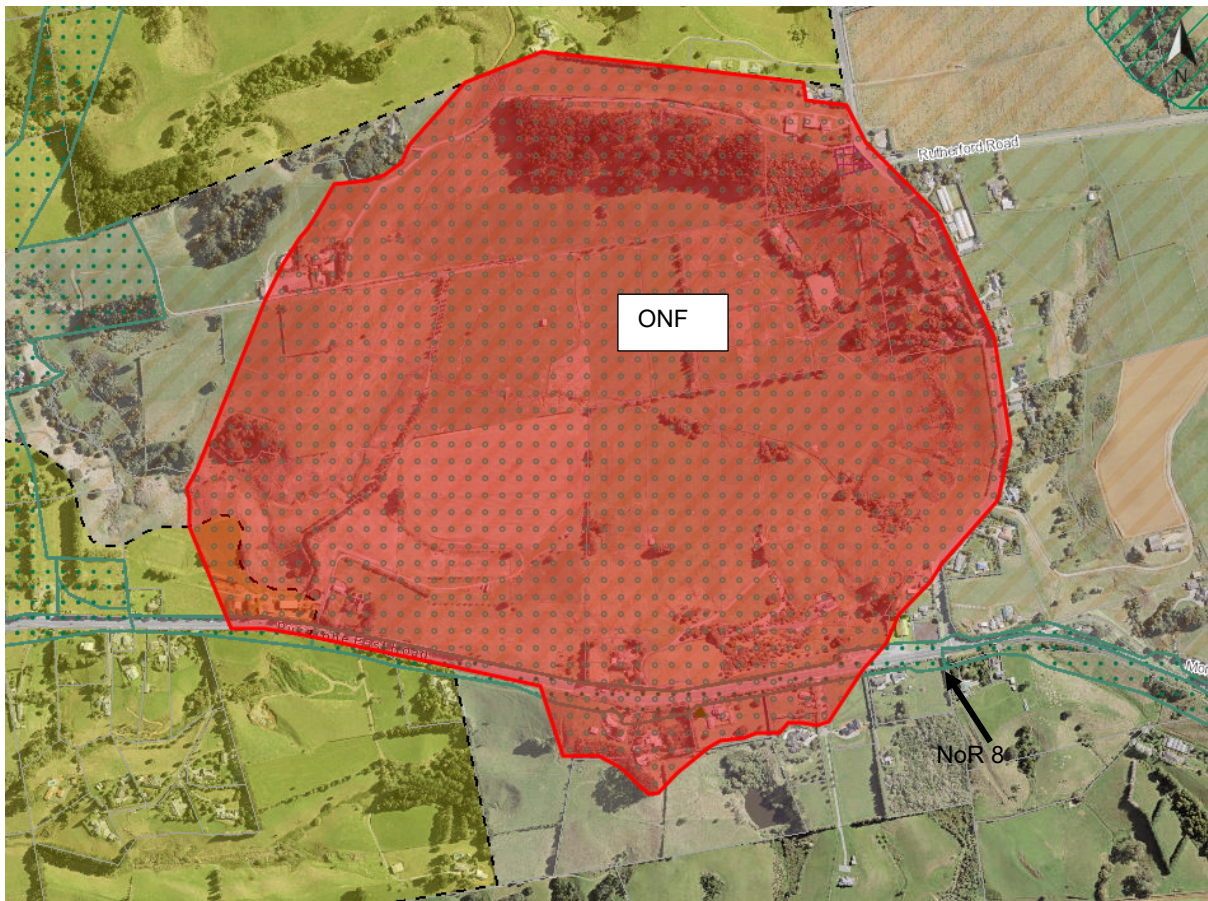


Figure 7-2 Location of the ONF and the NoR.

The groups located in the ONF are described in detail in the AEE and are located in front of 131 and 133 Pukekohe East Road, at 190, 196, 197A, 200, 216, 218A and 220 Pukekohe East Road. There is a Notable Tree (Schedule 2785 - English Oak and Norfolk Pine with an unverified position) shown as being located on 60 Morgan Road which has a number of trees on its frontage. A mature pūriri at 203 Mill Road, Notable Tree (Schedule 2705) is noted as potentially requiring part of its root zone removed and may likely require removal.

A redwood tree located at 165C Mill Road, Notable Tree Schedule 686 will be located within the designation and may require works within its root zone. This tree is not protected.

The proposed upgrade of Pukekohe East Road is for active mode facilities on the southern side of the existing road. Therefore, it is assumed in the AEE that trees on the northern side of the road can be retained and protected through protocols set out in a tree management plan (condition 24). A schedule of trees to be included in the management plan is included in the NoR (Schedule 3). It is noted that two trees are listed in the schedule (71 and 72) that as being Notable trees from the AUP but are not shown on the planning maps.

Specialist Review

The council's arborist consultant Leon Saxon has reviewed the NoR and provided a response which is included in Attachment 3.

He notes that given the timeframe for the likely construction associated there is potential for trees to become protected between the time of designation and construction. This could occur through the growth of trees, or through changes in adjacent land zoning. NoR 8 has a Tree Management Plan condition and the ULDMMP condition is considered by Mr Saxon suitable to ensure replanting occurs.

Planning Review

There is a submission from CH Daroux in relation to a 11ha property affected by both NoR 8 and NoR 5 (there is no site subject to both) that raises the issue of tree protection. It is uncertain if this submission relates to NoR 8.

It is noted that trees that were assessed are in Outstanding Natural Feature overlays or are scheduled and that removal of these trees would trigger the need for discretionary activity consent under the relevant objectives and policies of Chapters D10 (Outstanding Natural Features Overlay and Outstanding Natural Landscapes Overlay) and D13 (Notable Trees Overlay) of the AUP. At the very least the expectation would be that the removal of trees is mitigated by replacement of an appropriate number and size of tree. It would be useful to understand how Condition 10 of the UDLMP / Condition 24 would interface in this regard.

I consider that the potential adverse effects on arboriculture can be avoided, remedied, or mitigated, subject to the above.

7.5.14 Community Effects

Requiring authority AEE

There are no community and recreational facilities noted in Sections 9.13.2 of the AEE, in the description of the receiving environment for NoR 8.

Section 11.2 in the AEE discusses the positive effects of the network as a whole, noting them under the follow headings as:

- Supporting growth
- Improving access
- Maintaining connectivity
- Safety improvements
- Improvements to active mode facilities
- Improved connections to public transport and rapid transit networks.

Section 11.12 of the AEE discusses the community effects of all the NoRs and in relation to NoR 8 notes that the Mill Road and Pukekohe East Road Upgrade provides a connection for communities between Auckland and Waikato and from SH1 to Pukekohe urban areas for traffic and freight, with a major rural active mode connection. The AEE notes that safety improvements also generate community benefits. The AEE notes that the provision of active mode facilities provides additional means of transport to commute to employment and education. Improved mode choice has the potential to improve the way people live and enhance community connectivity for both the existing environment and the future urban community. In particular, active mode facilities positively impact both the health and wellbeing and way of life (the way people work, play and live) of the community

As noted in 11.12.5 a Stakeholder Communication and Engagement Management Plan (SCEMP) will be prepared prior to the start of construction to identify how the public and stakeholders (including directly affected and adjacent owners and occupiers of land) will be communicated with throughout the Construction Works. Access and trip disruption will be managed by the CTMP and SCEMP proposed as conditions of the designation. Construction effects on amenity values of property can be managed by engagement with stakeholders identified through the SCEMP, as well as through the development and implementation of the CVNMP and the CEMP.

Planning Review

The Pukekohe East Community Centre and tennis courts are a community facility located immediately adjacent to the NoR at the intersection with Runciman Road. It would be useful to understand what the effect of the works will be on access and use of the facility during construction. It is also noted that the area of road immediately in front of the site appears to be used for parking – potentially when there is an event at the hall.

There are no submissions on this effect other than that of the Ministry of Education in which concern about the potential for existing schools, or any future schools developed in this area, to be affected.

The Ministry of Education is seeking to changes to conditions to ensure that appropriate conditions are included in the designations to mitigate any adverse effects associated with the construction of the Pukekohe transport network on its schools. Mr Edwards supported the inclusion of changes to the CTMP in this regard and they are shown in Attachment 5, other changes are included in relation to the definitions of Educational Facilities and Stakeholders as requested by the Ministry. In addition, it would be helpful to hear from the requiring authority on any impacts on the other schools and the changes to conditions requested by the Ministry as noted. Especially in relation to the need to align the conditions with those used elsewhere in the region.

It would also be helpful for the requiring authority to provide a response at the hearing in relation to health and safety and other effects of the project and the concerns about impacts on dwellings linked to the 20 year lapse date.

At this time, I consider that the potential adverse effects on community facilities can be avoided, remedied, or mitigated, but this assessment is subject to the above information being provided.

7.5.15 Property and Land Use Effects

Requiring authority AEE

The description of the receiving environment in section 9.13.2 of the AEE of notes that the land use is agricultural land (predominantly pastoral) interspersed with rural residential development.

Property effects are considered in Section 11.13 of the AEE discusses potential adverse effects on existing private properties noting that they have been reduced where practicable.

The discussion notes that potential adverse effects on the development of private property may arise. However, it is noted in the AEE that development is not precluded within the proposed designated area. Waka Kotahi will work with landowners and developers under the process in s176(1)(b) of the RMA to provide written consent for development within the proposed designations, provided those works will not prevent or hinder the work authorised by the proposed designation.

Section 11.13.1 of the AEE notes that land required for the permanent work will be acquired prior to construction and if temporary occupation is required then the land will be leased.

Landuse effects are closely tied to property effects, and these are noted in Section 11.13.1 under Construction Effects in the AEE as ranging from the temporary lease/use of land include disruption to farm activities and businesses, disruptions to access, loss of vegetation, temporary loss of grazing pasture and temporarily affected amenity.

Measures such as development and implementation of a SCEMP, CTMP, CNVMP and CEMP prior to the start of construction are noted as appropriately minimising disruption to affected properties and allow the continued use of the properties were practicable. Potential construction effects will generally be temporary.

The post construction effects are noted in section 11.13.2 of the AEE and are focused on the process of redefining the designation boundary after the Completion of Construction and any land not required for the permanent work or for the ongoing operation, maintenance or mitigation of effects of the Project being reinstated in coordination with directly affected landowners or occupiers and returned. The timing for this process occurring is unstated.

Section 11.14.2 if the AEE notes that some key land uses located adjacent to the corridors will need specific consideration in the management of construction traffic (such as additional controls at key access locations), including an arterial road with high traffic volumes in NoR 8.

Planning Review

No Council specialist assessment has been sought for property and land use effects. However, I agree with the AEE that there is an overlap between the property and land use effects, but also that the other effects such as transport, noise and vibration and community effects will also play a part in relation to land use effects in terms of the land not directly affected by the NoR.

I note that the AEE in the description of the receiving environment does not specifically recognise that the eastern end of Mills Road has the business zoned land at the Bombay interchange with SH1 or that a number of the rural activities include intensive farming practices with pack houses, large areas of parking and associated structures (such as at 187 and 182 Mill Road).

The NoR can be expected to have commenced to have had effects on normal property and land use activity on the directly affected land. In terms of the effects on the directly affected while I note that the Public Works Act 1991 (PWA) is the legislative framework under which entitled landowners will receive compensation and that this is a non-RMA process, the restrictions imposed on private property is a land use effect. Given the activities on the land subject to the NoR, this could result in a form of blight and a loss in production due not the land being unattended to or a reluctance to investment. The 20 year lapse period will be playing a part in relation to this.

The key issue for many of the submitters as expressed in their submissions is concern about the impact of the designation on their property. C Daroux (Submission 3) is concerned about the impact of the two NoRs (5 and 8) on his property, although the site is not stated. The submission raises the impact of the 20 year lapse period and considers that there are no ground for this. The Campaign for Better Transport submission supports the lapse period.

The two submissions related to 197 Pukekohe East Rd are as noted earlier concerned about access but one (Maimere Properties) also raises the issue related to the boundary fence replacement.

R Cunningham – Submission 9 has is located on 80 Mills Road and is concerned about the loss of property values (his submission has also been included in the submissions to the WDC NoR8).

Some of the Rural zoned land subject to the NoR is identified as being Highly Productive land under the transitional definition in the National Policy Statement on Highly Productive Land (October 2022) (NPS-HPL). The effects of the removal of highly productive land are not specifically assessed in the AEE or raised by submitters. However, there is an assessment of the relevant NPS-HPL objectives and policies in the AEE where it is noted that the alignment of the designation will not significantly erode or fragment the highly productive land.

As with NoR 2 the conditions set includes a condition (5) that provides for Network Utility Operators with existing infrastructure located within the designation to undertake a range of work without requiring written consent under section 176 of the RMA, there is no such provision for directly affected landowners who for potentially 20 years will need permission from Waka Kotahi to undertake work on their own land.

It would also be useful to understand if any specific effects on the use of highly productive land both before and during construction have been identified by the requiring authority and if they can be addressed to ensure that the production potential for the land around the NoR and within the NoR and the ongoing viability of their business is retained (such as ensuring vehicle access to properties for farming activities during construction and limiting construction impacts during times where there are high levels of farming activity etc.). It is common to also have a condition that sets out the process for removing the designation but there are no conditions related to this process. It would be helpful to understand why.

At this time, I consider that the potential adverse effects on property and land use can be remedied or mitigated, but this assessment is subject to the above information being provided and potentially changes to the conditions to address how the ongoing use of the directly affected land will be enabled given the long lapse period sought.

7.5.16 Effects on Network Utilities /other infrastructure providers

Requiring authority AEE

Section 10 of the AEE notes that engagement with the network utilities has been through a two monthly forum. It notes that the forum includes representatives from Watercare, Vector, First Gas and Transpower and feedback from network utilities has been considered through alternatives assessment and concept design of the project.

Section 11.14 of the AEE provides a list of known existing and proposed utilities within and around the proposed designation. The following network utilities and requiring authorities with assets or designations in the footprint of NoR 8 are noted:

Utility Provider /Requiring Authority	Asset	Designation reference in the AUP
Watercare	Watermain, sewer main, and pipe assets	N/A
First Gas Limited	Pukekohe to East Tamaki Gas Pipeline [this pipeline is also designated in the WDC side of NoR 8]	9104
New Zealand Transport Agency	State Highway 1	6701
New Zealand Transport Agency	State Highway 1	6702

Section 11.14 notes that to undertake work in accordance with a designation on land where there is an existing designation in place, the written consent of the requiring authority for the earlier designation is required under section 177(1)(a), however it is noted that this has not been obtained at this stage as it is not required to designate the land. The discussion in the AEE notes that consultation with the requiring authorities, whose approval will be required in the future, has taken place and will continue as the Project is developed.

To mitigate effects on network utilities, section 11.14.1 notes that a Network Utilities Management Plan (NUMP) will be prepared prior to construction of the Project in consultation with the relevant network utility operators. The discussion explains that the NUMP will set out a framework for protecting, relocating and working in proximity to existing network facilities.

Planning Review

No Council specialist assessment has been sought for effects on network utilities and other infrastructure. It is noted that submissions to NoR 8 have been received from the following Requiring Authorities and network utilities:

- Submission 6 - Telecommunication submitters (Aotearoa Towers Group (ATG), Chorus New Zealand Limited(Chorus), Connexa Limited (Connexa), One New Zealand (One NZ) (formally Vodafone New Zealand Ltd) and Spark New Zealand Trading Limited (Spark);
- Submission 12 - Firstgas Limited;
- Submission 13 - Watercare Services Limited (Watercare);and
- Submission 15 -Counties Energy Limited (CEL).

The CEL submission indicates general support for the NoR but raises concerns related the need to access to future and existing assets. The submission notes that the alignment of the high voltage Bombay-Pukekohe (north) 110kV line is incorrect, where it crosses to the north side of Mill Road; and appears to be in area identified for future cut and installation of a culvert, both of which could compromise the safe operation of a critical asset. CEL seek further consultation and note that detailed planning is required

The Telecommunication Group point out that none of the group are listed in Section 11.14 of the AEE despite having existing infrastructure within and around the proposed designated boundaries and seek to ensure that existing and potential future telecommunications infrastructure in the project corridors are adequately addressed

and oppose the NoR if their concerns are not addressed. The submission points out that the works enabled by the proposed designations will affect existing infrastructure that will need to be protected and/or relocated as part of the proposed works and that while provision is made for a condition called the Land Use Integration Process (LIP) in the Auckland Transport's Notices of Requirement there is no provision for an LIP in NoR 2. The submission notes that exclusion of LIP conditions creates a potential lack of integration and dialogue between the project teams and existing infrastructure providers such as the Telecommunications Submitters. They seek amendment of the NUMP conditions and an advice note to be added to the NUMP condition unless a LIP condition or similar is added.

Watercare's submission states that Watercare neither supports or opposes any of the Pukekohe NoR but seeks to ensure that any decisions made respond to the issues raised in this submission. In particular that the works provided for under the NoR's avoids, remedies or mitigates potential adverse effects on Watercare's ability to provide water and wastewater services now and in the future. Watercare acknowledges the engagement to date and seeks early engagement to enable opportunities to plan and future proof the delivery of assets to provide for well-functioning urban environments. In addition, Watercare wishes to ensure it maintains access to its assets 24 hours a day, 7 days a week for maintenance, safety and efficient operation of its services. Watercare while supporting the conditions related to the NUMP SCEMP and LIP considers further amendments are required to the NUMP condition and Watercare also seeks that the LIP condition is included in Waka Kotahi's NoRs, as opposed to only being included in the Auckland Transport NoRs as is currently proposed.

Firstgas notes that it owns and operates the 200 and the 400B transmission lines, the main transmission lines supply Auckland and Northland that are located within the NoR and that it has concerns that the lodged plans do not provide clear indication of pipeline locations on the southern side of Mill Road and the NoR is silent on the intersection of the project with the 200-transmission pipeline. The submission notes that the NoR has the potential to impact negatively upon a safe and continuous gas supply to Auckland and Northland consumers through designs that may not consider the pipelines from the initial concept. It asks:

- That the General Arrangement Layout Plan show the gas pipelines along the entire locale where the project intersects with them;
- That Condition 5 (b) specifically constitutes written approval for the works listed in (a) (i) – (iv) post-construction;
- That Condition 10 includes specific requirement for consultation with Network Utility Operators in the design and preparation, and any subsequent establishment and/or maintenance works associated with the ULDMP.

There is no specific discussion about effects on these utilities or assets in section 11 of the AEE.

Works within the existing road reserve are controlled under the Utilities Access Act 2010 and associated National Code of Practice for Utility Operators Access to Transport Corridors. The Code of Practice allows utility providers to access the road reserve (excluding motorways) as of right, subject to reasonable conditions imposed from the transport authority. Access to the local road network subject is managed through a Corridor Access Request process to Auckland Transport currently as the region's road controlling authority. This means that a network utility would need to seek written consent from Waka Kotahi and obtain a Works Approval Permit from Auckland Transport (unless the road is classified as a state highway and Waka Kotahi becomes the Road Controlling Authority). However, Condition 5 as proposed sets out when such works do not need Waka Kotahi approval under section 176 of the RMA.

As there is no further discussion on the effects on network utilities, it is not clear if the mitigation proposed in the form of the NUMP (condition 2) and Condition 5 will be adequate. However, it is noted that the Telecommunication Group and Watercare consider that further work on Condition 5 is needed and it would be useful to hear from the requiring authority in relation to the changes requested.

At this time, I consider that the potential adverse effects on network utilities and other infrastructure can be avoided, remedied or mitigated, but this assessment is subject to the above information being provided.

7.5.17 Effects conclusion

In regard to the overall effects of the Project, I consider that subject to the provision of the information requested and further amendments to the conditions recommended above and included in Attachment 5 to this report, the potential adverse effects on the environment from the construction and operation of NoR 8 can be appropriately avoided, remedied or mitigated.

7.6 National policy statements

Section 171(1)(a)(ii) requires the council to, subject to Part 2, consider the effects on the environment of allowing the notice of requirement, having particular regard to any relevant provisions of a national policy statement.

7.6.1 National Policy Statement on Urban Development 2020 ('NPS-UD')

The NPS-UD has the primary objective of ensuring that New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. This also includes, among other things, improving housing affordability by supporting competitive land and development markets and ensuring that urban environments are integrated with infrastructure planning and funding decisions. The NPS-UD also requires that local authorities must be satisfied that additional infrastructure to service the development capacity is provided and likely to be available in addition to being resilient to the current and future effects of climate change.

The requiring authority has assessed the Project against the relevant provisions of the NPS-UD in Table 12-1 of the AEE. In summary, the requiring authority finds that the Project consistent with the objectives and policies by providing for the necessary transport infrastructure to support the development of land and the eventual establishment of the necessary development capacity.

I concur with these conclusions and consider that the NoR will support and enable future growth proposed in the Pukekohe area while also promoting and providing for active modes of transport and public transport. In that regard, I agree that the NoR give effect to the NPS-UD. In addition, I consider that the conditions, as recommended to be amended, will give effect to the NPS-UD.

7.6.2 National Policy Statement on Freshwater Management 2020 (NPS-FM)

The NPS - FM endeavours to implement Te Mana o te Wai by prioritising first the health and well-being of water bodies and freshwater ecosystems followed by the health needs of people and then the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.

Its objective and policies endeavours to ensure that natural and physical resources are managed in a way that prioritises first, the health and well-being of water bodies and freshwater ecosystems followed by the health needs of people and then the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future. In particular, the NPS-FW seeks to protect natural wetlands, rivers, outstanding waterbodies and habitats of indigenous freshwater species.

It is noted that these provisions will apply at the regional consent stage for consents sought under section 13, 14 and 15 of the RMA.

In the context of route selection and protection under these NoRs the requiring authority has assessed the Project against the relevant provisions of the NPS-FW in Table 12-1 of the AEE. Even though the AEE notes that the AEE is focused on district plan matters the requiring authority concludes that contributes to the wider Pukekohe Transport Network contributes to achievement of these objectives and policies by avoiding or minimising adverse effects on water bodies and freshwater ecosystems at this stage (noting regional consents will be obtained in future).

7.6.3 National Policy Statement on Electricity Transmission ('NPS-ET')

The NPSET endeavours to recognise and provide for the significance of the electricity transmission network, by facilitating the operation, maintenance and upgrade of the network whilst managing adverse effects of the network and managing adverse effects of other activities on the network.

7.6.4 New Zealand Coastal Policy Statement (NZCPS)

The NZCPS contains objectives and policies relating to the coastal environment. Consideration of the NZCPS has not been undertaken in the AEE specifically. address the NZCPS. However, the requiring authority's consideration of Part 6 (section 13.1 of the AEE) of the RMA does state:

'The proposed designations will not impact upon any existing public access to streams or the CMA. The Pukekohe Transport Network has the potential to increase access to rivers/streams by providing walking and cycling facilities and integrating with future parks and connections proposed through development.'

The project also includes a range of measures to be included in management plans relating to maintaining water quality in streams that discharge into the Manukau Harbour. These measures can be further developed and adapted at the detailed design and Outline Plan of Works stages.

Overall, I consider that NoR 8 is consistent with the NZCPS subject to the conditions, as recommended to be amended.

7.6.5 National Policy Statement on Highly Productive Land ('NPS-HPL')

The NPS-HPL came into effects on 17 October 2022 and has the broad objective that:

2.1 Objective: *Highly productive land is protected for use in land-based primary production, both now and for future generations.*

The definition of "highly productive land" is as follows:

'highly productive land means land that has been mapped in accordance with clause 3.4 and is included in an operative regional policy statement as required by clause 3.5 (but see clause 3.5(7) for what is treated as highly productive land before the maps are included in an operative regional policy statement and clause 3.5(6) for when land is rezoned and therefore ceases to be highly productive land).'

The areas subject to the transitional definition have been mapped in the AUP.

The NPS-HPL contains 9 policies to implement the objective and these policies include the following relevant policies:

Policy 1: Highly productive land is recognised as a resource with finite characteristics and long-term values for land-based primary production.

Policy 4: The use of highly productive land for land-based primary production is prioritised and supported.

Policy 8: Highly productive land is protected from inappropriate use and development.

In combination these policies set a high threshold for protection of soil, primarily for the production of food. However, the NPS-HPL also recognises land designated for infrastructure in section 3.9. This section relates to circumstances where the use or development of highly productive land is appropriate and includes the following in section 3.9(2)(h):

- (h) it is for an activity by a requiring authority in relation to a designation or notice of requirement under the Act:

Section 3.9(2)(j) of the NPS-HPL also provides:

- (j) it is associated with one of the following, and there is a functional or operational need for the use or development to be on the highly productive land:
 - (i) the maintenance, operation, upgrade, or expansion of specified infrastructure:

The AEE only lightly touches on this NPS in within Table 12-1. The Assessment in Table 12-1 centres on the exemptions in Clause 3.9(2) of the NPS-HPL and concludes that they apply. The assessment also concludes that because the projects are generally located along the edge of the highly productive land or will enable the ongoing use of the land either side of the projects for rural production purposes it contributes to the achievement

of the NPS-HPLs objectives and policies. It states that adverse effects of the projects on adjacent highly productive land will be appropriately mitigated prior to construction is required. It also states that a new road is one of the listed exemptions for specified infrastructure and the presence of specified infrastructure on HPL does not preclude the balance of the HPL being used by land-based primary production.

Rural zoned land along Mill Road and Pukekohe East Road is identified as being 'highly productive land' and is used for food production.

There is guidance produced²³ to assist in the implementation of the NPS-HPL that notes that minimises or mitigates a loss of productive capacity could include:

- The location of the activity – whether it can be sited somewhere on the subject site that minimises the impact on the productive capacity of HPL
- The footprint of the activity – whether efforts have been made to keep the footprint of the activity as small as possible to minimise the actual loss of HPL
- Clustering of activities – whether there is an option to group a number of activities in a similar location to mitigate the cumulative loss of HPL that would occur through activities being spread out across a wider area of HPL (eg, clustering of buildings, co-location of telecommunications infrastructure or containing multiple activities in the same building, such as using an existing residential dwelling for a home business or visitor accommodation activity, rather than constructing multiple buildings)
- Co-existing with land-based primary production – whether the activity can be designed in such a way that it does not preclude being able to carry out land-based primary production around the activity (eg, the potential for using the land around specified infrastructure to be used for vegetable production or animal grazing).

I agree that NoR 8 falls within the exceptions listed above in (h) and (j) and is therefore consistent with the NPS-HPL. However, in terms of Clause 3.9(3) (b) of the NPS-HPL the territorial authority must take measures that avoids if possible or mitigates actual or potential reverse sensitivity effects on land-based primary production activities from the use avoided or minimised. As noted in Section 6.6.15 the effects of the removal of highly productive land are not specifically assessed in the AEE so it is not clear how the impact on highly productive land has been minimised. It would be helpful to receive that information from the requiring authority to confirm that the works are consistent with the NPS-HPL.

7.6.6 National Policy Statement on Indigenous Biodiversity 2023 (NPS-IB)

The National Policy Statement on Indigenous Biodiversity (NPS-IB) applies to indigenous biodiversity in the terrestrial environment and has just come into force. Clause 1.4 of the NPS-IB notes that it applies to the terrestrial coastal environment in conjunction with the NZCPS and that if there is conflict the NZCPS prevails. Clause 1.4 also notes that if there is a conflict between the provisions of the NPS-IB and the NPS- FM or the Resource Management (National Environmental Standards for Freshwater) Regulations 2020, the latter prevail.

The NPS-IB seeks to maintain indigenous biodiversity across New Zealand so that there is at least no overall loss in indigenous biodiversity. The Policies of NPS-IB seek that a cautionary approach is used when considering effects on indigenous biodiversity both within and beyond Significant Natural Areas (SNAs) and including areas supporting highly mobile fauna. Increased indigenous vegetation cover in urban and non-urban environments is promoted, as is information gathering and monitoring of indigenous biodiversity.

The NPS-IB prioritises the mauri and intrinsic value of indigenous biodiversity and recognises people's connections and relationships with indigenous biodiversity while recognising the relationship between indigenous species, ecosystems, the wider environment, and the community and in particular the bond between tangata whenua and indigenous biodiversity and obligations of care that tangata whenua have as kaitiaki of indigenous biodiversity among other principles.

²³ Ministry for the Environment. 2023. National Policy Statement for Highly Productive Land: Guide to implementation. Wellington: Ministry for the Environment.

As noted in Table 12-1 of the AEE the route has avoided high value habitat areas and SEA. Most of the route of NoR 8 has already been modified by the farming activities that have occurred however there are areas of indigenous biodiversity located close to the streams. In the context of route selection and protection under this NoR the requiring authority has assessed the Project against the relevant provisions of the NPS-IB. Even though the AEE notes that the AEE is focused on district plan matters the requiring authority concludes that contributes to the wider Pukekohe Transport Network contributes to achievement of these objectives and policies by avoiding or minimising adverse effects on water bodies and freshwater ecosystems at this stage (noting regional consents will be obtained in future).

I agree with this assessment.

7.7 Regional Policy Statement (Chapter B of the AUP) (RPS)

The RPS sets the strategic direction for managing the use and development of natural and physical resources throughout Auckland. The following sections of the RPS are considered relevant to the NW Local Arterial NoRs:

- Chapter B2 Tāhuhu whakaruruhau-ā-taone – Urban Growth and Form
- Chapter B3 Ngā pūnaha hanganga, kawekawe me ngā pūngao – Infrastructure, transport and energy
- Chapter B4 Te tiaki taonga tuku iho – Natural heritage
- Chapter B5 Ngā rawa tuku iho me te āhua – Historic heritage and special character
- Chapter B6 Mana Whenua
- Chapter B7 Toitū te whenua, toitū te taiao – Natural resources
- Chapter B10 Ngā tūpono ki te taiao – Environmental risk

The requiring authority has assessed the Project against the relevant provisions of the RPS in Section 12 and Table 12-1 of the AEE.

RPS Chapter	Section of Table 12-1
Chapter B2	Urban growth and development capacity
	Urban form and quality design
	Natural hazards
Chapter B3	Urban growth and development capacity
	Enabling infrastructure
	National Grid
Chapter B4	Urban form and quality design
	Ngā Manawhenua
Chapter B5	Natural landscapes
Chapter B6	Historic Heritage
Chapter B7	Ngā Manawhenua
Chapter B9	Indigenous Biodiversity and ecological values
	Freshwater
	Ngā Manawhenua
Chapter B10	Urban growth and development capacity
	Highly Productive Land
Chapter B10	Natural hazards

I generally agree with the requiring authority's assessment under the RPS provisions subject to the changes recommended to conditions and the content and implementation of the management plans and processes proposed as part of the NoR.

7.8 Auckland Unitary Plan district plan provisions

7.8.1 Auckland Unitary Plan (Operative in part)

The Auckland Unitary Plan district plan provisions are addressed in section 12 and Table 12-1 of the AEE (along with the RPS provisions discussed above).

I generally concur with SGA's assessment of the Project against the AUP district plan provisions. I consider NoR 2 to be consistent with the AUP district plan provisions.

7.8.1.1 Auckland Unitary Plan - Chapter D overlays

Chapter D provisions are identified in the receiving environment descriptions in section of the AEE and addressed in section 12 and Table 12.1 of the AEE

The NoR is subject to a range of overlays in the AUP including the following:

	NoR 8
D1: High Use Aquifer Management Areas Overlay [rp]	✓
D2 Quality Sensitive Management Areas Overlay	✓
D3 High Use Stream Overlay[rp]	✓
D10 Outstanding Natural Features Overlay and Outstanding Natural Landscapes Overlay [DP]	✓
D13 Notable Tree Overlay [DP]	✓

The provisions of Chapter D1, D2 and D3 re regional provisions. Therefore, an assessment of these will be required at the regional resource consent stage.

Without repeating the detail of the assessment in the AEE, the requiring authority concludes that NoR 8 is consistent within the overlay provisions. I concur with the assessment of the requiring authority and have no further comments to add.

7.8.1.2 Auckland Unitary Plan – I precincts

The Bombay 1 sub- precinct applies to the eastern end of NoR 8.

The requiring authority notes in Table 12-1 of the AEE that the objectives and policies of the Bombay 1 Precinct (adjacent to NoR 8) seek to enable the establishment of motorway and rural service activities where the amenity values of land adjoining the precinct are maintained and protected, and the site layout ensures safe and convenient access for vehicles and pedestrians.

I note that the NoR actually overlays a corner of the precinct but agree with the conclusion of the assessment that NoR 8 is consistent with the objectives and policies of the Bombay 1 Precinct as it will enable safe access to the precinct for vehicles and active modes of transport. The NoR will provide upgrades to Mill Road which will improve the safety and amenity of the area.

7.8.1.3 Auckland Unitary Plan - Chapter E Auckland-wide

The following Auckland wide chapters are addressed by the requiring authority in Table 12.1 of the AEE. Without repeating the detail of this assessment, it is considered that relevant Chapter E chapters are:

- E1 Water quality and integrated management
- E11 Land disturbance - Regional
- E12 Land disturbance – District
- E15 Vegetation management and biodiversity
- E17 Trees in roads
- E25 Noise and vibration
- E26 Infrastructure

- E27 Transport
- E36 Natural hazards and flooding.

I agree with the assessment provided by SGA in section 12 and Table 12-1 of the AEE on these matters.

I note that Table 12 -1 did not consider the following Auckland -Wide Chapters :

- E2 Water quantity, allocation and use
- E3 Lakes, rivers, streams and wetlands
- E8 Stormwater - Discharge and diversion
- E9 Stormwater quality - High contaminant generating car parks and high use roads
- E24 Lighting

While I recognise that the effects of stormwater discharges (quality and quantity) and discharges to streams and works in streams are the subject of regional consents, it would be helpful if these had also been considered in Table 12.1. I also note that lighting effects have been recognised there is no assessment in terms of relevant objectives and policies.

7.8.1.4 Auckland Unitary Plan – Chapter H Zones

Chapter H provisions are addressed in section 12 and Table 12.1 of the AEE. The relevant zones are considered to be:

- H7: Open Space – Conservation
- H12- Business - Neighbourhood Centre Zone
- H18: Future Urban Zone
- H19: Rural Zones – Mixed Rural Zone and Rural – Rural Production zone

I concur with the requiring authority's assessment provided in section 12 and Table 12-1 of the AEE of the above provisions of Chapter H.

7.8.1.5 4.7.2 Council-Initiated Proposed Plan Changes to the Auckland Unitary Plan (Operative in part)

Section 43AA of the RMA provides the meaning of proposed plan:

(2) *In this Act, unless the context otherwise requires, proposed plan—*

(a) *means a proposed plan, a variation to a proposed plan or change, or a change to a plan proposed by a local authority that has been notified under clause 5 of Schedule 1 or given limited notification under clause 5A of that schedule, but has not become operative in terms of clause 20 of that schedule; and*

(b) *includes—*

(i) *a proposed plan or a change to a plan proposed by a person under Part 2 of Schedule 1 that has been adopted by the local authority under clause 25(2)(a) of Schedule 1:*

(ii) *an IPI notified in accordance with section 80F(1) or (2).*

(3) *Subsection (1) is subject to section 86B and clause 10(5) of Schedule 1.*

There are no plan changes directly relevant to NoR 8.

7.9 **Alternative sites, routes or methods – section 171(1)(b)**

The requiring authority does not have an interest in all the land and the effects of the works are likely to be significant. Therefore, an assessment of alternative sites, routes or methods is required. The requiring authority's assessment of alternatives is set out in Appendix A to the AEE. Section 5.11 of Appendix A to the AEE discuss the nature of the alternative assessment and design refinements that have taken place in relation to NoR 8.

Figure 5-18 of the AEE, outlines the process undertaken through the corridor and route refinement assessment of alternatives.

Based on guidance from caselaw I understand that the issue is whether the requiring authority has adequately considered alternatives, and not whether the 'best' option has been chosen, or that all possible alternatives have been considered. Therefore, the option chosen by the requiring authority is the one that it considers meets the objectives of the requiring authority and the Project. However, the requiring authority does need to ensure that it has considered all reasonable options and has not 'acted arbitrarily or given cursory consideration to the alternatives'²⁴.

In my opinion, the information supplied demonstrates that the requiring authority has satisfied the requirements of section 171(1)(b), in that adequate consideration has been given to alternative sites, routes, or methods of undertaking the work.

7.10 Reasonable necessity for work and designation – section 171(1)(c)

The requiring authority has set out its specific project objectives for NoR 8 in the Form 18 documents. These are listed in the AEE as follows:

Improves connectivity between and within Drury and Pukekohe.

- Improves connectivity in Pukekohe;
- Supports Vision Zero and road safety outcomes;
- Supports resilience and the existing transport network by providing an upgraded transport connection including adding additional capacity to Mill Road;
- Supports planned urban growth and the future transport network by upgrading an existing strategic connection for new future urban communities;
- Supports travel choice by providing for all modes of transport; and
- Contributes to mode shift and the transition to a low carbon transport network by providing for active modes.

The AEE concludes that the designations are reasonably necessary to achieve the project objectives. I agree with this assessment and conclude that the works and designations are reasonably necessary to achieve the requiring authority's objectives.

7.11 Any other matter – section 171(1)(d)

Section 171(1)(d) requires the council to have particular regard to any other matter the territorial authority considers reasonably necessary in order to make a recommendation on the requirement. In this case the non-RMA documents are considered relevant.

The requiring authority states, in Section 12.1 of the AEE, that it considers that there are other matters under s171(1)(d) that are reasonably necessary to make a recommendation on the NoR. The requiring authority has provided an assessment against a range of other legislation, central government and local government plans, strategies and policies in Table 12.1 of the AEE. I generally concur with the assessments and conclusions of the AEE on any other matter and the range of other documents listed.

As noted in relation to NoR 2, I consider that the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 NES (Soil) is a relevant other matter that has not been considered or given regard to specifically. The requiring authority has listed that resource consent under the NES (soil) as being required but they are not being sought at this time. I have included an advice note in the conditions to ensure this is captured as part of the designation going forward.

²⁴ Waimairi District Council v Christchurch City Council C30/1982

I also note that the AEE refers to the Draft Future Development Strategy (FDS) which is considered an 'other matter'. It would be helpful given that the FDS has now been finalised, for the requiring authority to advise if the assessment would change.

7.12 Designation lapse period extension – section 184(1)(c)

A 20 year lapse is sought by Waka Kotahi and AT for all of the NoR required to deliver the Pukekohe Transport Network. The need for this in relation to all of the NoRs is explained on the basis that the period allows for the uncertainty in relation to urbanisation and funding timeframes and is necessary because:

- It provides statutory protection of the land required for transport infrastructure to support future growth in a manner that recognises the uncertainty associated with the timing of that growth.
- It supports efficient land use and transport integration by enabling the efficient delivery of transport infrastructure at a time and in a way that is integrated with future urbanisation.
- It provides each Requiring Authority time to obtain funding, purchase the land and design the projects; and obtain the necessary resource consents and other statutory approvals.
- It provides property owners, businesses and the community certainty on where transport routes will be located (i.e., within the designation boundaries).

It is also noted in the AEE that a lapse period is a limit and not a target and that longer lapse periods are not uncommon for large infrastructure projects.

The fact that the majority of the Pukekohe Transport Network is within the FUZ is also noted in the AEE as essentially a mitigation of any potential blight effect resulting from the extended lapse period as the zone is a transitional zone that anticipates urbanisation and there is already uncertainty. However, this is not the case for NoR 8, where much of the land is not expected to be urbanised. The fact that the network is unlikely to be implemented until urbanisation is (at least) confirmed is also noted.

As outlined in section 7.5.15 it would also be helpful to hear from the requiring authority in response to the issues raised on how the impact of the requested 20 year lapse period could be mitigated on land that will not benefit from the change in zoning enabled by the network improvements. Subject to the response and more details on the potential changes to the designation conditions I am generally in support of the lapse period sought.

7.13 Part 2 of the Resource Management Act 1991

The purpose of the RMA is set out in section 5(1) which is: to promote the sustainable management of natural and physical resources.

Sustainable management is defined in section 5(2) as:

...managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while –

- (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
- (b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
- (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

An assessment under section 5 of RMA is provided in section 13.4 of the AEE. I generally agree with the assessment provided subject to the recommended new/amended conditions and the further information sought in this report.

Section 6 of the RMA sets out the matters of national importance which must be recognised and provided for. An assessment of all of the NoRs required to deliver the Pukekohe Transport Network is addressed in section 13.1

and Table 13.1, of the AEE. In relation to NoR 8, section 6 (b) is relevant as impacts from NoR 8 being located within the ONF overlay in the AUP are noted. It is also noted that through alternatives assessment process, effects on the ONF (referred to as ONL in the assessment) were minimised and that opportunities to further recognise the ONF can be identified through the Cultural Advisory Report, ULDMP, Landscape Management Plan and Cultural Monitoring Plan for NoR 8 in particular are noted.

In relation to section 6(h) it is noted in the AEE that there is one pre-1900 site recorded south of the proposed designation NoR 8, R12/1208 - Bombay Flour Mill or Pilgrim's Mill. While the assessment notes that it is likely the former building site is located outside of the designation, associated features may be unearthed during construction within the designation. The assessment notes that an HNZPT authority will be sought for the works before construction. I generally agree with this assessment.

Section 7 of the RMA sets out other matters which shall be given particular regard to. An assessment of all of the NoRs required to deliver the Pukekohe Transport Network is addressed in section 13.2 and Table 13.2 of the AEE. I generally agree with this assessment.

Section 8 of the RMA requires the principles of the Treaty of Waitangi to be taken into account. An assessment is contained in section 13.3 of the AEE. I generally agree with this assessment.

7.14 Conclusions

The requiring authority has lodged NoR 8 under section 168 of the RMA for the Mill Road and Pukekohe East Road upgrade.

I consider that subject to the provision of the requested information set out in this report that it is recommended to the requiring authority that NoR 8 should be confirmed subject to conditions and with modifications, for the following reasons:

- The notices of requirement and associated works are reasonably necessary for achieving the objectives of the requiring authority.
- Adequate consideration has been given to alternative sites, routes or methods of undertaking the work identified in the notices of requirement.
- The notices of requirement are generally consistent with the relevant AUP provisions.
- The notices of requirement are generally in accordance with part 2 of the RMA and; and relevant national environmental standards and national policy statements.
- Restrictions, by way of conditions, imposed on the designation can avoid, remedy or mitigate any potential adverse environmental effects.

I note that there are different conditions sought for the section of NoR 8 in WDC. The issue of whether there needs to be consistency between all of the conditions should be addressed, given that the difference in the rules that are the reason for this approach as stated in the documentation may no longer be relevant in 20 years.

7.15 Recommendation and conditions

7.15.1 Recommendation

Subject to new or contrary evidence being presented at the hearing, it is recommended that the notices of requirement be confirmed by the requiring authority, subject to the amended and additional conditions, set out in Attachment 5 to this report.

That pursuant to section 171(3) of the RMA the reasons for the recommendation are as follows:

- The notice(s) of requirement are consistent with Part 2 of the RMA in that it enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety.
- The notice(s) of requirement are consistent with and give effect to the relevant national environmental standards, national policy statements and the AUP.
- In terms of section 171(1)(b) of the RMA, adequate consideration has been given to alternative sites, routes or methods for undertaking the work.

- In terms of 171(1)(c) of the RMA, the notice(s) of requirement is reasonably necessary to achieve the requiring authority's objectives.
- Restrictions, by way of conditions attached to the notice(s) of requirement have been recommended to avoid, remedy or mitigate adverse environmental effects associated with the works.

Attachment 1: Copies of Submissions to NoR 2 and NoR 8

Attachment 2: Franklin Local Board Resolution 28 November 2023

Attachment 3: Auckland Council Specialist Reviews

Attachment 4: Summary of Submissions

Attachment 5: Conditions

ATTACHMENT ONE

COPIES OF SUBMISSIONS (NOR2 & NOR8)

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:906] Notice of Requirement online submission - Lloyd Harrison and Evelina Ah-Wong
Date: Sunday, 29 October 2023 3:01:10 pm
Attachments: [NOR2 - 143 Tuhimata Rd - Title NA90A 439.pdf](#)

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

Contact details

Full name of submitter: Lloyd Harrison and Evelina Ah-Wong

Organisation name:

Full name of your agent:

Email address: euphoria@xtra.co.nz

Contact phone number: 0211290557

Postal address:
143 Tuhimata Road
RD2
Drury 2578
Paerata
Auckland 2578

Submission details

Name of requiring authority: Waka Kotahi NZ Transport Agency

The designation or alteration: Pukekohe : NOR 2 Drury – Pukekohe Link

The specific provisions that my submission relates to are:
3,918m2 of land at 143 Tuhimata Road Title Number: NA90A/439 SG Reference Number 510765

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

The reason for my or our views are:

We disagree with the use of rural zoned land for development. We feel that the land under NOR 2 for the purpose of Storm water Wetland/Attenuation Device is on the highest point of land, and would require extensive excavation for this purpose. The discharge from the Storm water Wetland/Attenuation Device planned for the west side of our property, is an area where the land is prone to landslides/creeping , which has already occurred.

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

We ask that the Storm water Wetland/Attenuation Device and discharge of, be moved approximately 150 metres further South/South East towards the natural low area, to avoid excessive excavation of land. This would then be within the FUZ and not encroach on rural zoned land.

Submission date: 29 October 2023

Supporting documents
NOR2 - 143 Tuhimata Rd - Title NA90A 439.pdf

Attend a hearing

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

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

Yes

Declaration

I accept and agree that:

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

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— = Proposed Road

○ = Proposed Roundabout

New suggested site for stormwater review

Submission to; Notice of Requirement, Drury-Pukekohe (NoR 2)

Proposed Sim Road Highway from Karaka Road to Great South Road

Summary

Supporting Growth have proposed a new Sim Road highway to incorporate future heavy industrial traffic and take it from west to east across the area between Pukekohe and Drury. We are told that some of this traffic will come from an industrial development in Glenbrook.

The proposed route will have multiple roundabouts within a very short distance. One of the roundabouts will have a steep slope leading up to it in two directions.

Major trucking companies who operate in the area have told the Supporting Growth group that, because of the poor concept and design of the proposed highway, they would be unlikely to use it, - and - they would seek alternative routes.

Our local councillors and local MP have directly voiced their serious misgivings regarding the poor concept and design of this Supporting Growth proposal. Plus, they have supported the concerns and alternatives put forward to Supporting Growth.

The concerns and proposals from our residents, councillors and MP have been wilfully ignored, without explanation.

The proposed highway would be extravagantly expensive for a very inefficient connecting road. On top of the expected cost of buying the affected road frontages, the cost of all the roundabouts, and the cost of buying the affected homes and farms, - there is the unjustifiable extra cost of positioning the highway at the widest and longest part of the east-west area - and the huge cost of removing a hill.

We have identified other options close by that would have much less environmental impact, a lighter social impact and would cost significantly less but Supporting Growth have refused to engage.

These options would have a far higher likelihood of being given a budget green light in the future.

Description

The volume of traffic Supporting Growth have modelled for their proposed Sim Road highway is 15,000 vehicles per day. The group were looking for concept plans to move freight and residential traffic across the area from east to west.

There are multiple options that could fulfil that criterion. It is important to note that many of those options given to Supporting Growth could have that volume of traffic going through land that is already semi-industrial and will not affect critical future food supply.

Despite the other cheaper and much less impactful options, Supporting Growth have chosen one they thought would give them weak local opposition and allow them to fulfil their brief efficiently and conveniently. Once they'd chosen the route their policy has been to "dig-in" and hope the predictable noise of opposition would simply fade away, - like it usually does in thousands of these cases in the past. This is a working management model for Supporting Growth. Their job as contractors is to fulfil their design brief within the specified time frame, - then send off their invoice. The future outcome is not their problem.

Unfortunately, that corporate style of "pushing through and ignoring objections" has also blinded Supporting Growth to the realistic and better options being shown to them. These are options provided by people with generational knowledge and expertise in this area. Even more alarming, their policy also included ignoring elected representatives from the Auckland Council and our elected Parliament who can all see the serious flaws in the Supporting Growth plan.

Clearly, by having to take these better options into account it would be inconvenient and not fulfil the contractors own overriding objectives of either achieving the time frame KPI or getting paid.

Serious money has already been wasted on the Sim Road highway and much more will be wasted pursuing such a flawed concept and design, but this is treated by Supporting Growth as irrelevant.

The Auckland Council have recently reviewed and changed their position on the loss of rural productive land due to expansion and development. The Supporting Growth plan for the Sim Road highway is in stark contrast to that forward looking position. This proposed new highway would impact some of New Zealand's most fertile and premium growing land. It cannot be dismissed as just average farmland. This is some of the most organically valuable farmland in all of New Zealand. The highway would ruin a lot of the productive areas of the farm in question.

Given there are better options to avoid this loss while still achieving the same transport objectives, future generations would be appalled to know why this was ever allowed to happen.

The proposed highway design has several roundabouts incorporated within its length. To give you an idea of how seriously flawed the design is, the road is designated as an 80km/hr highway, but will have roundabouts scattered at 500 – 600 metre intervals. For even light traffic to be able to reach a reasonable average speed in that distance it would need special circumstances.

It was explained to us that there are plans to make our main arterial route, Karaka Road, into slow moving 50km/hr zone in future. Therefore, we were told an 80km/hr highway would be the best way to shift a large volume of traffic efficiently.

Unfortunately, it doesn't matter what speed limit is put on this proposed new highway, with that number of closely spaced roundabouts, traffic will be slow at any time of the day or night.

The environmental impact of stopping and starting traffic in that situation will be obvious to anyone. The interruption to efficient traffic flow should also be obvious. The impact for

heavy transport operators is much worse than light cars and will also be very clear. It is much more expensive for them to constantly stop and start big rigs because of the massive hit to fuel consumption. Consequently, this will also massively increase their carbon output.

To make matters even more nonsensical, one of the multiple roundabouts is designated for the top of a hill. This means those big rigs will be doing repeated starts on a steep slope (on both sides) as traffic slowly works its way through these roundabouts.

It was no surprise then when the local transport operators consulted by Supporting Growth told them they would be unlikely to use this road. In fact, they have made it clear to us they would actively avoid such a road. A road that is supposedly being designed for them to use.

At a residents meeting attended by Waka Kotahi representatives, we were told by those representatives that; “efficiently moving traffic was not a priority” for their organisation.

When asked about the efficacy of a roundabout on top of the hill, the Waka Kotahi answer was; “We will simply remove the hill”. However, nobody from either Supporting Growth or Waka Kotahi could give us cost calculations for removing that hill. This option also does not show on plans shown to affected homeowners.

Clearly, they hadn’t thought about that scenario or even considered it up to that point. Even more alarming, most of the representatives from Supporting Growth admitted to us that they had not even visited the site in question to see it for themselves. For those consultants, on a flat 2D map, it would all look very simple and straightforward.

There are very obvious and striking reasons why this ill-conceived highway plan should be investigated further and the much more viable options considered. Approving poorly designed plans simply because they have been thrust in front of a panel is not sufficient reason for this to go ahead. A lot of our taxpayer and ratepayer money has already been wasted, but it is better to pause and have the plans reviewed now rather than going forward for the sake of sheer convenience and ticking a “job completed” box.

It would be a serious mistake to ratify such a deeply flawed concept that could result in drastic and permanent implications for existing and future Auckland residents. This is a plan, that once properly reviewed, will reveal all its obvious shortcomings.

It is worth repeating a statement made earlier in this submission; *It is important to note that many of those options given to Supporting Growth could have that volume of traffic going through land that is already semi-industrial and will not affect critical future food supply.*

We trust that you take the position that you hold in shaping New Zealand’s future seriously. There are cheaper, more effective and less damaging options available for this route.

Stuart Owers
109 Sim Road, Paerata.

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

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



FORM 21

Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 16, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only

Submission No:

Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) Rachel Beaurain

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

Address for service of Submitter

469 Sim Road Paerata 2676

Telephone: 292005800

Email: rduley@gmail.com

Contact Person: (Name and designation if applicable)

This is a submission on a notice of requirement:

By:: Name of Requiring Authority

Waka Kotahi NZ Transport Agency

For: A new designation or alteration to an existing designation

Pukekohe NOR 2: Drury – Pukekohe Link

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

The location of the proposed road in relation to 447 to 491 Sim Road

The effect of the huge increase of noise and traffic numbers and street lighting on home owners

Access issues to all properties 447 to 491 Sim Road

There is a wetland proposed next to 491 Sim Road at literally the highest point of the road

My submission is:

I or we support of the Notice of Requirement

I or we oppose to the Notice of Requirement

I or we are neutral to the Notice of Requirement

The reasons for my views are:

Converting 447 to 491 Sim Road into a highway means that all the homes that come off Sim Rd will be off a main highway. The highway should be built further west of Sim Rd with Sim Rd having one access point onto the highway. This means no properties coming off the highway and creates less obstructions on the highway. The future urban area will not be impeded by this

as a row of houses could be then built on the west side of Sim Road to allow for this.

The new road will seriously negatively affect the value of all properties on Sim Road

We live here because we need the quiet to sleep and these changes will significantly affect this

There is no timeframe provided for this work to be done which leaves all owners on Sim road in limbo.

(continue on a separate sheet if necessary)

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

The highway should be moved further west of Sim Road leaving properties 447 to 491 Sim Road separate from the highway with one access point to it

The highway must be built below the level of the current Sim Road to mitigate noise/lighting effects

Noise levels during construction and permanent mitigation must be agreed with affected home owners

I wish to be heard in support of my submission

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

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

Rachel Beaurain

07/11/2023

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

Date

Notes to person making submission:

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

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

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

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

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:919] Notice of Requirement online submission - Rachel Beaurain
Date: Tuesday, 7 November 2023 7:00:48 PM

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

Contact details

Full name of submitter: Rachel Beaurain

Organisation name:

Full name of your agent: Rachel Beaurain

Email address: rduley@gmail.com

Contact phone number: 0292005800

Postal address:

469 Sim Road

Paerata 2676

Auckland 2676

Submission details

Name of requiring authority: Waka Kotahi NZ Transport Agency

The designation or alteration: Pukekohe : NOR 2 Drury – Pukekohe Link

The specific provisions that my submission relates to are:

The location of the proposed road in relation to 447 to 491 Sim Road The effect of the huge increase of noise and traffic numbers and street lighting on home owners Access issues to all properties 447 to 491 Sim Road There is a wetland proposed next to 491 Sim Road at literally the highest point of the road

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

The reason for my or our views are:

Converting 447 to 491 Sim Road into a highway means that all the homes that come off Sim Rd will be off a main highway. The highway should be built further west of Sim Rd with Sim Rd having one access point onto the highway. This means no properties coming off the highway and creates less obstructions on the highway. The future urban area will not be impeded by this as a row of houses could be then built on the west side of Sim Road to allow for this. The new road will seriously negatively affect the value of all properties on Sim Road. We live here because we need the quiet to sleep and these changes will significantly affect this. There is no timeframe provided for this work to be done which leaves all owners on Sim road in limbo.

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

The highway should be moved further west of Sim Road leaving properties 447 to 491 Sim Road separate from the highway with one access point to it. The highway must be built below the level of the current Sim Road to mitigate noise/lighting effects. Noise levels during construction and permanent mitigation must be agreed with affected home owners.

Submission date: 7 November 2023

Attend a hearing

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

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

Yes

Declaration

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
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Before you fill out the attached submission form, you should know:

You need to include your full name, an email address, or an alternative postal address for your submission to be valid. Also provide a contact phone number so we can contact you for hearing schedules (where requested).

By taking part in this public submission process your submission will be made public. The information requested on this form is required by the Resource Management Act 1991 as any further submission supporting or opposing this submission is required to be forwarded to you as well as Auckland Council. Your name, address, telephone number, email address, signature (if applicable) and the content of your submission will be made publicly available in Auckland Council documents and on our website. These details are collected to better inform the public about all consents which have been issued through the Council.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious.
- It discloses no reasonable or relevant case.
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
- It contains offensive language.
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

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

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



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Attn: Planning Technician
Auckland Council
Level 16, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only

Submission No:

Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

Mr. Barnardus Jacobus Beaurain

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

Address for service of Submitter

469 Sim Road, Paerata, Pukekohe, 2676

Telephone:

224924790

Email:

barrybeaurain@yahoo.co.uk

Contact Person: (Name and designation if applicable)

This is a submission on a notice of requirement:

By:: Name of Requiring Authority

Waka Kotahi NZ Transport Agency

For: A new designation or alteration to an existing designation

Pukekohe NOR 2: Drury – Pukekohe Link

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

The location of the road and designation boundary in relation to 469 Sim Road.

Noise and visual effect of the increase in traffic numbers, type and frequency over a much greater part of day and night.

Possible problems with future access to and from 469 Sim Road's dwelling, sheds and paddocks.

My submission is:

I or we support of the Notice of Requirement

I or we oppose to the Notice of Requirement

I or we are neutral to the Notice of Requirement

The reasons for my views are:

There is space to move the new proposed road (designation boundary) to the west of where it is shown adjacent to 447 to 491 Sim Road.

It is possible to leave Sim Road as it is currently for a majority of it. This will provide some separation to the highway, and 1 point of access for residents rather than several.

The timeframe is not provided. This uncertainty affects homeowner's decisions in terms of the way their properties are used and developed over the next 20 years.

(continue on a separate sheet if necessary)

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

Construction of the road must not take place on weekends or public holidays, after 7pm or before 7am on any working day.

The level of the new road must not be higher than the existing level of Sim Road. Raising the road will affect the residents more severely in terms of noise and visual dominance.

Noise mitigation during and as a permanent solution must be agreed with affected home owners. As per section ? 469 Sim Road is affected.

Street lighting is to be shielded from shining onto private properties. Should be concentrated on road only.

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

Barry Beaurnain

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

09/11/2023
Date

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Submission No:

Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

Mr. Barnardus Jacobus Beaurain

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

Address for service of Submitter

469 Sim Road, Paerata, Pukekohe, 2676

Telephone:

224924790

Email:

barrybeaurain@yahoo.co.uk

Contact Person: (Name and designation if applicable)

This is a submission on a notice of requirement:

By:: Name of Requiring Authority

Waka Kotahi NZ Transport Agency

For: A new designation or alteration to an existing designation

Pukekohe NOR 2: Drury – Pukekohe Link

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

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Noise and visual effect of the increase in traffic numbers, type and frequency over a much greater part of day and night.

Possible problems with future access to and from 469 Sim Road's dwelling, sheds and paddocks.

My submission is:

I or we support of the Notice of Requirement

I or we oppose to the Notice of Requirement

I or we are neutral to the Notice of Requirement

The reasons for my views are:

There is space to move the new proposed road (designation boundary) to the west of where it is shown adjacent to 447 to 491 Sim Road.

It is possible to leave Sim Road as it is currently for a majority of it. This will provide some separation to the highway, and 1 point of access for residents rather than several.

The timeframe is not provided. This uncertainty affects homeowner's decisions in terms of the way their properties are used and developed over the next 20 years.

(continue on a separate sheet if necessary)

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

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The level of the new road must not be higher than the existing level of Sim Road. Raising the road will affect the residents more severely in terms of noise and visual dominance.

Noise mitigation during and as a permanent solution must be agreed with affected home owners. As per section ? 469 Sim Road is affected.

Street lighting is to be shielded from shining onto private properties. Should be concentrated on road only.

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

Barry Beaurain

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

09/11/2023
Date

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- (a) Adversely affects the environment, and
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Form 21

Submission on requirements for designations

To: Auckland Council
Private Bag 92300
Auckland 1142
unitaryplan@aucklandcouncil.govt.nz

Waikato District Council
Private Bag 544
Ngaruawahia
3742
info@waidc.govt.nz

Name of submitter: Aotearoa Towers Group (ATG)
Trading as FortySouth
Private Bag 92161
Auckland 1142

Chorus New Zealand Limited (Chorus)
PO Box 632
Wellington

Connexa Limited (Connexa)
167 Victoria St West
Auckland

One New Zealand (One NZ) (formally Vodafone New Zealand Ltd)
Private Bag 92161
Auckland 1142

Spark New Zealand Trading Limited (Spark)
Private Bag 92028
Auckland 1010

These parties are making a joint submission and for the purposes of this submission are referred to collectively as the ***Telecommunications Submitters***.

The Proposal:

This is a submission on the following notices of requirement by Auckland Transport and Waka Kotahi NZ Transport Agency for transport projects in Pukekohe, Paerata and Drury in South Auckland:

- Pukekohe Transport Plan NoR 1: Drury West Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 2: Drury – Pukekohe Link (Waka Kotahi NZ Transport Agency)
- Pukekohe Transport Plan NoR 3: Paerata Connection (Auckland Transport)
- Pukekohe Transport Plan NoR 4: Pukekohe North-East Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 5: Pukekohe South-East Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 6: Pukekohe South-West Upgrade (Auckland Transport)
- Pukekohe Transport Plan NoR 7: Pukekohe North-West Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 8: Mill Road and Pukekohe East Road Upgrade (Waka Kotahi NZ Transport Agency) (Auckland Council and Waikato District Council)

The Telecommunications Submitters are not trade competitors for the purposes of section 308B of the Resource Management Act 1991.

The specific parts of the notice of requirement that this submission relates to are:

The conditions of the designations that relate to Network Utility Operators and the Land Use Integration Process (LIP).

The Telecommunications Submitters' submission is that:

The Telecommunications Submitters have no position on the overall Pukekohe to Drury package of transport projects but seek to ensure that existing and potential future telecommunications infrastructure in the project corridors are adequately addressed.

The Telecommunications Submitters **oppose** the proposed designations unless the matters outlined in this submission are satisfactorily addressed.

The organisations collectively deliver and manage the majority of New Zealand's fixed line/fibre and wireless phone and broadband services in New Zealand. The network utility operators in the telecommunications sector deliver critical lifeline utility services (as per Schedule 1 to the Civil Defence Emergency Management Act 2002) including infrastructure to support emergency services calls. It is also crucial for supporting social and economic wellbeing and measures to reduce travel demand. It provides opportunities for work from home/remote work solutions through fast internet connections by fibre and/or wireless means which promotes a lower carbon economy.

The equipment used to deliver this is often located in road corridors which act as infrastructure corridors as well as just transport corridors. The works enabled by the proposed designations will affect existing infrastructure that will need to be protected and/or relocated as part of the proposed works. The design and construction of the works should take into account any opportunities for new infrastructure to be installed which is preferable than trying to retrofit necessary telecommunications/ broadband infrastructure later due to disruptions and/ or incompatibility with project design.

Existing Infrastructure

A summary of existing infrastructure located in the project footprints is as follows and is outlined in more details viewable in **Appendix A**:

- FortySouth Facility: Pole located at the Belgium Road Intersection in NoR 5 (supporting One NZ network).
- FortySouth Facility: Pole located at 122 Princes St W in NoR 6 (supporting One NZ network).
- Connexa Facility: Found at Belgium Road Intersection in NoR 5 (supporting Spark network).
- Connexa Facility: 59 Ward Street in NoR 6 (Supporting 2degrees network).
- Connexa Facility: Pole on Puni Road in NoR 6 (Supporting Spark network).
- Chorus has extensive fibre and copper lines networks throughout the project area.
- Mobile operators are progressively rolling out roadside equipment and fibre routes in Auckland roads which may be within project corridors when works proceed.

Future Infrastructure Requirements

Network utility operators need to integrate necessary services into infrastructure projects such as transport projects. This is especially significant for future development with the introduction of advanced technology such as 5G infrastructure, which will be crucial to transport infrastructure. It is most efficient to coordinate any such services with the design and construction of a project, rather than trying to retrofit

them at a later date. This process does not always run smoothly. To provide a previous example, Spark had substantial issues trying to negotiate with the Public Private Partnership (PPP) operator of the Transmission Gully project in the Wellington Region to install services to provide telecommunications coverage. This process proved to be very difficult as there was no requirement to consult and work with relevant network utility operators in the designation conditions, and post completion of the project design and PPP contracting, it proved to be very challenging to try to incorporate necessary telecommunications infrastructure into the design of this project. Connexa is already planning for potentially up to three additional mobile sites along the proposed designation corridors.

Spark achieved a more satisfactory outcome through participation as a submitter in the Auckland East West Link and Warkworth to Wellsford (W2W) project designation conditions where there was a specific obligation for the Requiring Authority to consult with network utility operators as part of the detailed design phase of the project to identify opportunities to enable the development of new network utility including telecommunications infrastructure where practicable to do so¹. While the Telecommunication Submitters are not asking for the exact same outcomes of these examples, it demonstrates mutual benefits with ease of collaboration, communication and cohesive infrastructure development.

This is reflected in more recent times in two separate occasions earlier this year where Auckland Transport and Waka Kotahi agreed to amend their proposed Network Utility Management Plan (NUMP) conditions to involve network utility operators during the design phase, as well as the inclusion of Land Integration Process (LIP) conditions on Auckland Transport designations. Satisfactory conditions in this regard have been agreed with the requiring authorities in the Airport to Botany and North West Transport Projects (aside to an equivalent approach to the LIP condition for Waka Kotahi designations). However, those agreed amendments to the NUMP condition have not been carried through to the Pukekohe to Drury NoRs.

All NoRs include a NUMP condition in the general conditions (26 for Auckland Transport and 25 for Waka Kotahi), which is not the same as the previously and recently agreed upon NUMP condition wording for the other abovementioned projects. The NUMP conditions used in the Pukekohe to Drury Project NoRs do not include the updated clause “(d) *the development of the NUMP shall consider opportunities to coordinate future work programmes with other network utility operator(s) **during detailed design** where practicable.*”

¹ East West Link Condition NU2, W2W Condition 24A

Whilst there is no direct obligation on the requiring authority to accommodate such works/opportunities, it is reasonable for there to be provisions to ensure the matter is properly considered during the design phase through consultation with network utility operators as it sets appropriate expectations and ensures these opportunities are properly explored. This enables proper consideration of making provision for communications infrastructure that support the function of the roads and/or serves adjacent growth. This should be a consideration distinct from protecting or relocating existing network utilities affected by the project which has previously been the focus of conditions to manage network utilities.

Whilst the LIP condition on Auckland Transport 's proposed designation now matches changes agreed on the other projects, there is still no equipment process for the proposed Waka Kotahi designations in this project to ensure the various telecommunications network providers are properly identified and engaged at relevant project stages.

Consultation with Telecommunications Network Utility Operators

Key to the outcomes the Telecommunications Submitters are seeking is to ensure they are adequately consulted by the requiring authorities over effects on their existing infrastructure, as well as being provided the opportunity to discuss any future requirements so this can be considered in the project design.

The Assessment of Environmental Effects (AEE) for each notice sets out the relevant utility providers who have assets within and around the proposed designations and is listed in the Network Utility Effects section. However, none of the Telecommunication Submitters are listed within the affected Utility Providers despite having existing infrastructure within and around the proposed designated boundaries. Therefore, it is a concern they will not be consulted as part of the NUMP development for each stage.

Spark and One NZ operate mobile phone/wireless broadband networks that are often located on facilities located in or adjacent to roads, while Chorus operate fixed line assets in roads including fibre. In addition, Spark has sold its fixed mobile asset infrastructure (e.g. their poles) to Connexa who are also acquiring the fixed assets of 2degrees, and similarly One NZ has sold its fixed mobile assets to Aotearoa Towers Group (trading as FortySouth). Accordingly, the operating landscape for telecommunications companies and who may be affected by these projects has become quite complex. Given this complexity, an advice note to the NUMP condition for the Waka Kotahi designations is proposed to provide more clarity on which telecommunications/broadband operators may be affected and to enable an engagement process to be established as the projects advance. This is not required for the Auckland Transport conditions given the LIP condition.

Land Use Integration Process (LIP)

Auckland Transport included a satisfactory LIP condition within their NoR's which are listed below. This reflected their previous requested changes to clause (f) and (f)(iii) and agreed upon for the Airport to Botany and Northwest Projects NoRs.

However, the following NoR's lodged by Waka Kotahi did not include LIP conditions:

- Pukekohe Transport Plan: Drury – Pukekohe Link (Waka Kotahi NZ Transport)
- Pukekohe Transport Plan: Mill Road and Pukekohe East Road Upgrade (Waka Kotahi NZ Transport) (Auckland Council and Waikato District Council)

The exclusion of LIP conditions creates a potential lack of integration and dialogue between the project teams and existing infrastructure providers such as the Telecommunications Submitters. This may compromise effective collaboration, cohesiveness and proper exploration of opportunities with regard to future infrastructure requirements being integrated into these projects. The Telecommunication Submitters are seeking relief in the form of satisfactory LIP conditions (equivalent to the Auckland Transport conditions) to be included within the two Waka Kotahi NoRs, or an alternative condition of like effect in regard to addressing the issues raised by the Telecommunications Submitters, or an advice note to the NUMP condition to clearly identify the current major network providers operating fibre and mobile phone/wireless broadband networks.

The Telecommunications Submitters seeks the following decision from the Requiring Authorities:

Amend the NUMP condition for each notice of requirement, as follows:

Network Utility Management Plan (NUMP)

(a) A NUMP shall be prepared prior to the Start of Construction for a Stage of Work.

(b) The objective of the NUMP is to set out a framework for protecting, relocating and working in proximity to existing network utilities. The NUMP shall include methods to:

(i) provide access for maintenance at all reasonable times, or emergency works at all times during construction activities;

(ii) protect and where necessary, relocate existing network utilities;

- (iii) manage the effects of dust and any other material potentially resulting from construction activities and able to cause material damage, beyond normal wear and tear to overhead transmission lines in the Project area; and*
- (iv) demonstrate compliance with relevant standards and Codes of Practice including, where relevant, the NZECP 34:2001 New Zealand Electrical Code of Practice for Electrical Safe Distances 2001; AS/NZS 4853:2012 Electrical Hazards on Metallic Pipelines; and AS/NZS 2885 Pipelines – Gas and Liquid Petroleum.*
- (c) The NUMP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project.*
- (d) The development of the NUMP shall consider opportunities to coordinate future work programmes with other Network Utility Operator(s) during detailed design where practicable.*
- (e) The NUMP shall describe how any comments from the Network Utility Operator in relation to its assets have been addressed.*
- (f) Any comments received from the Network Utility Operator shall be considered when finalising the NUMP.*
- (g) Any amendments to the NUMP related to the assets of a Network Utility Operator shall be prepared in consultation with that asset owner*

Add an advice note to the NUMP condition for the Waka Kotahi designations unless a Land Integration Process LIPcondition or similar is added in the alternative

Advice Note:

For the purposes of this condition, relevant telecommunications network utility operators include companies operating both fixed line and wireless services. As at the date of designation these include Aotearoa Towers Group (FortySouth), Chorus New Zealand Limited, Connexa Limited, One New Zealand Limited, Spark New Zealand Trading Limited, Two Degrees Mobile Limited (and any subsequent entity for these network utility operators).

Add a LIP condition equivalent to that proposed for the Auckland Transport designations, or any alternative mechanism ensuring there is a process for the project teams for the Waka Kotahi designations to properly identify and engage with relevant telecommunication network utility operators as part of project design.

The Telecommunications Submitters do wish to be heard in support of its submission.

If others make a similar submission, the Telecommunications Submitters will consider making a joint case with them at the hearing.



Signature of submitter
(Chris Horne, authorised agent for the Telecommunications Submitters)

Date: 10 November 2023

Address for service of submitter:

Chris Horne

Incite

PO Box 3082

Auckland

Telephone: 0274 794 980

E-mail: chris@incite.co.nz

Appendix A

Impacted Telecommunication Facilities

Telecommunication Sites Impacted

FortySouth

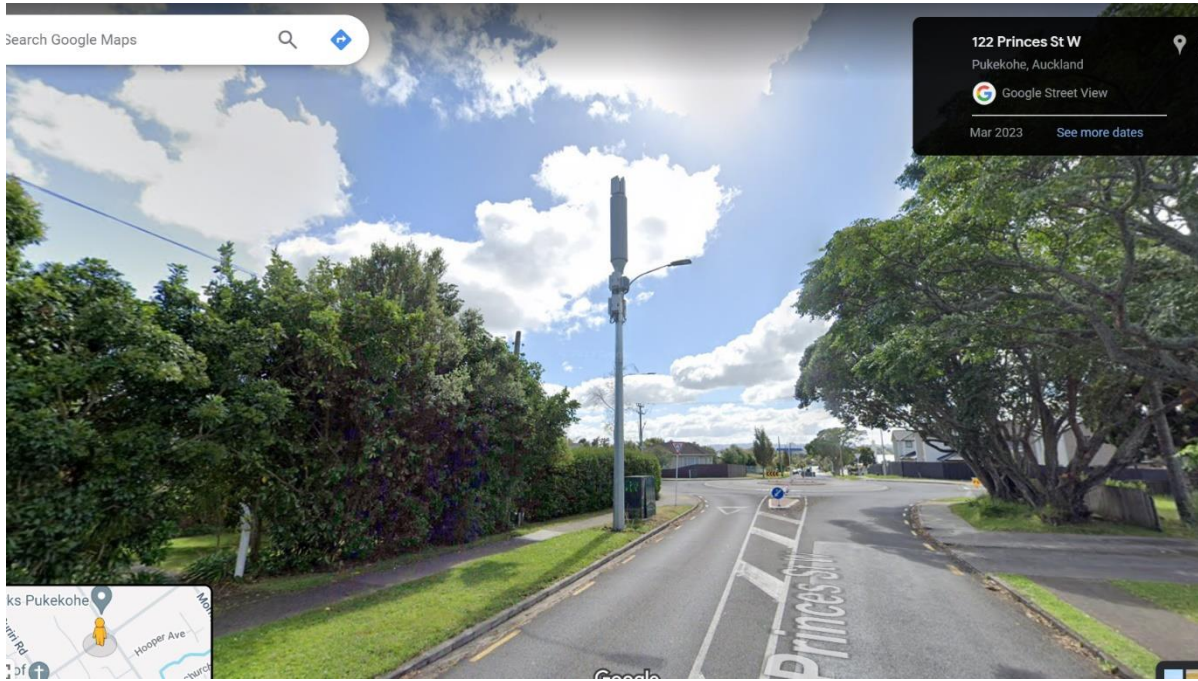
NoR 5 - Pukekohe South-East Arterial (Auckland Transport)

- Pole located at the Belgium Road Intersection in NoR 5 (supporting One NZ network)



NoR 6 - Pukekohe South-West Upgrade (Auckland Transport)

- Pole located at 122 Princes St W in NoR 6 (supporting One NZ network)



Connexa

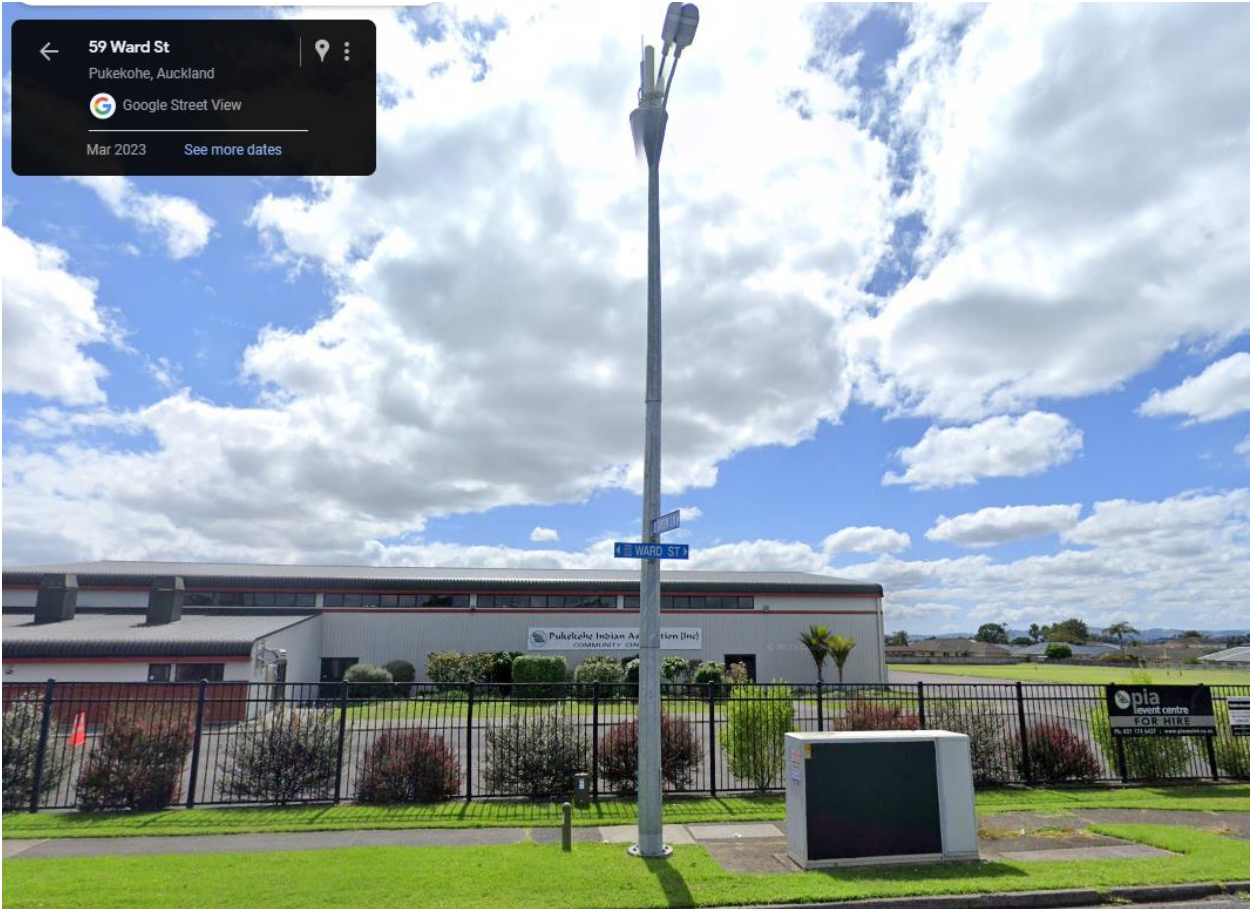
NoR 5 - Pukekohe South-East Arterial (Auckland Transport)

- Pole located at the Belgium Road Intersection in NoR 5 (supporting Spark network)



NoR 6 - Pukekohe South-West Upgrade (Auckland Transport)

- 59 Ward Street in NoR 6 (Supporting 2Degrees network)

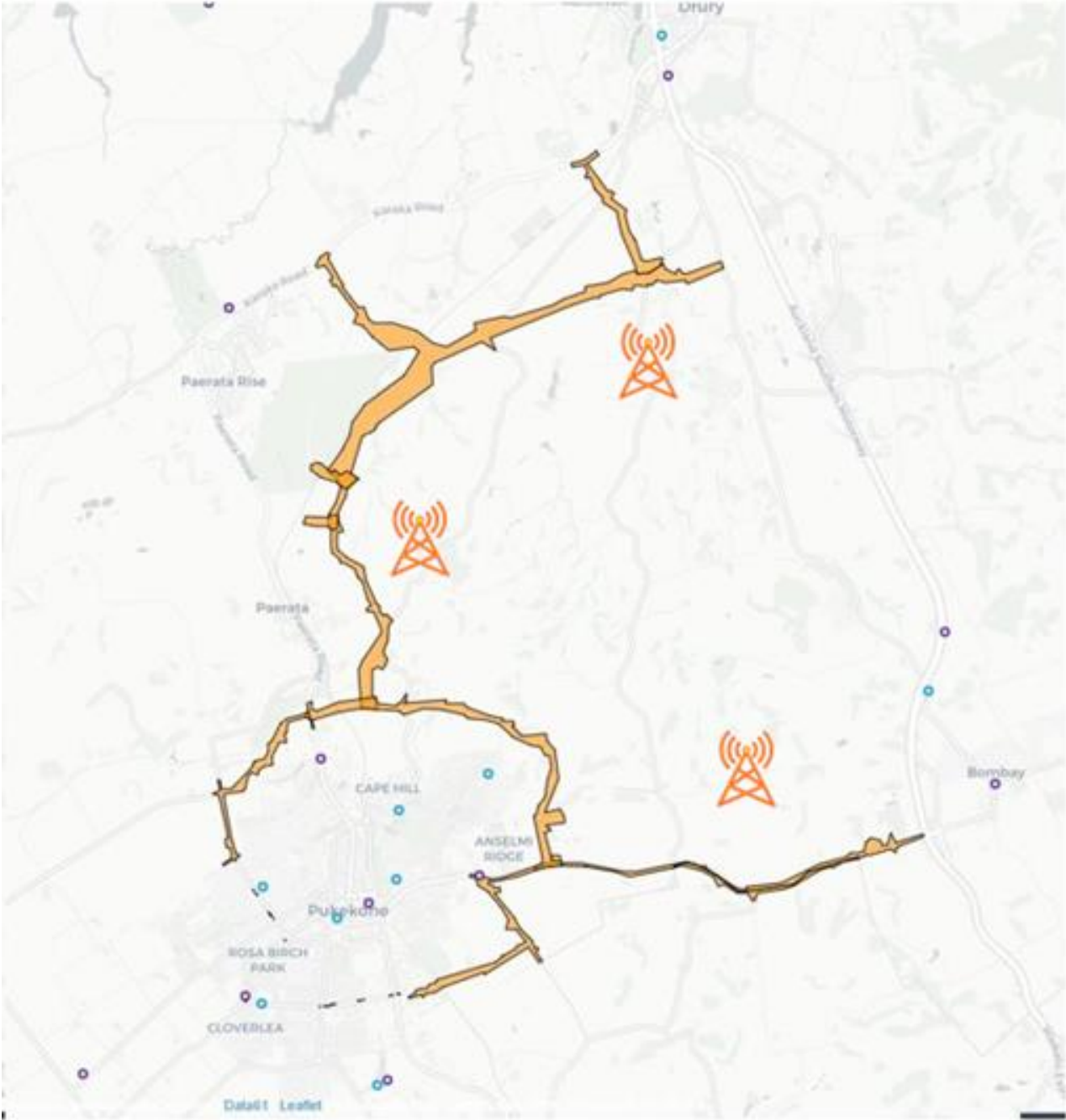


NoR 6 - Pukekohe South-West Upgrade (Auckland Transport)

- Pole on Puni Road in NoR 6 (Supporting Spark network)



Connexa Indicative Future Site Requirements



The yellow transmission pole symbols are indicative future Connexa sites. The proposed new locations are

- Runciman South
- Paerata
- Bombay West

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:932] Notice of Requirement online submission - Catherine Joyce
Date: Saturday, 11 November 2023 7:30:38 PM

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

Contact details

Full name of submitter: Catherine Joyce

Organisation name: N/A

Full name of your agent: N/A

Email address: cj.joyce@xtra.co.nz

Contact phone number: 021 143 2791

Postal address:

337 Burt Rd

Drury

Auckland 2578

Submission details

Name of requiring authority: Waka Kotahi NZ Transport Agency

The designation or alteration: Pukekohe : NOR 2 Drury – Pukekohe Link

The specific provisions that my submission relates to are:

The construction of a Highway through the family farm

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

The reason for my or our views are:

I am not opposed to the construction of the highway but i am suggesting the route of the highway goes as close to the rail way tracks as possible rather than dividing the farm in to two parts.

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

If the highway was positioned as close as possible to the train track then our diary farm would not be divided in two, the cows could continue to have uninterrupted access to all paddocks for grazing & the beauty of the farm and natural bushland would be retained. This would reduce the negative impact of hundred of cars each day on the health and well being of the dairy cows, their productivity and the growth of important farm crops.

Submission date: 11 November 2023

Attend a hearing

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

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

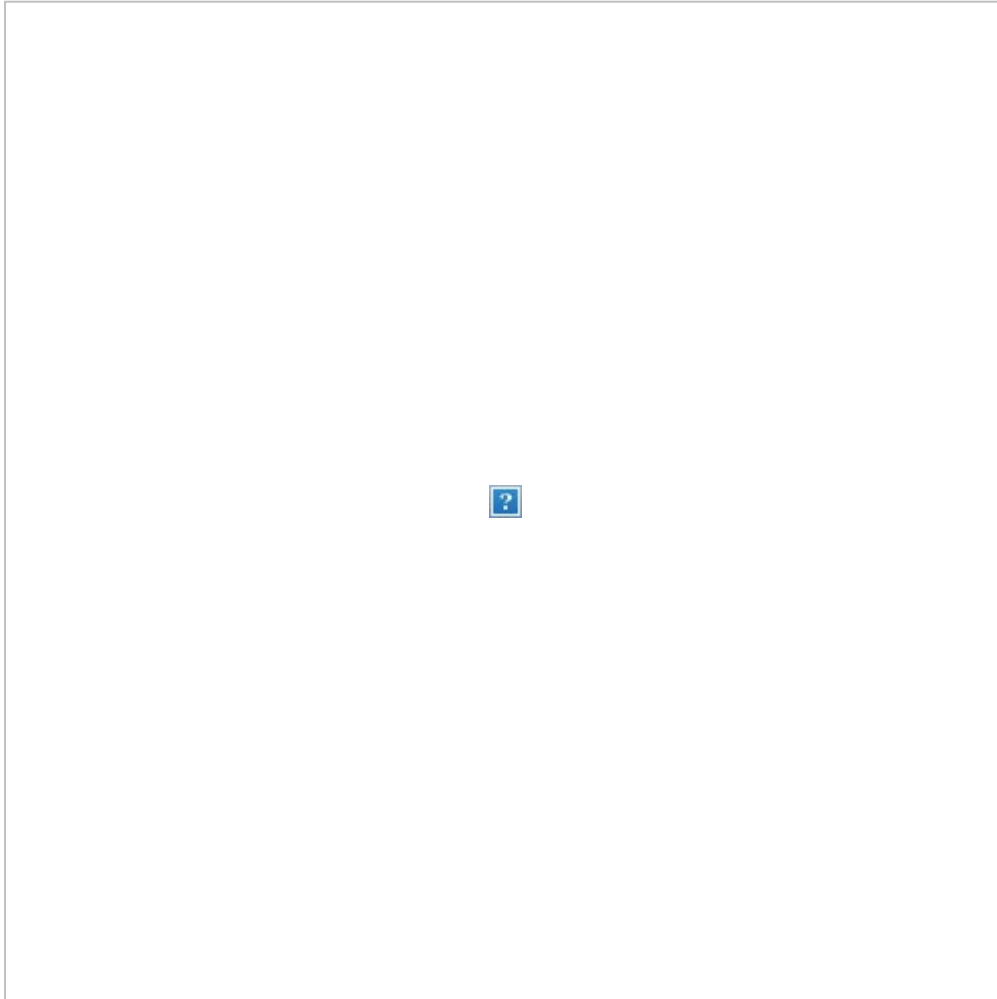
Yes

Declaration

I accept and agree that:

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

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



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From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:936] Notice of Requirement online submission - Madeline Ro
Date: Sunday, 12 November 2023 3:45:37 PM

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

Contact details

Full name of submitter: Madeline Ro

Organisation name:

Full name of your agent: Madeline Hart-Robb

Email address: harrobgroupp@gmail.com

Contact phone number:

Postal address:
213 Hart Road
RD 1
Pukekohe
Aucklan 2676

Submission details

Name of requiring authority: Waka Kotahi NZ Transport Agency

The designation or alteration: Pukekohe : NOR 2 Drury – Pukekohe Link

The specific provisions that my submission relates to are:
319E Sim Road

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

The reason for my or our views are:

My name is Madeline Robb and I have lived in Pukekohe for approximately thirty years and have come to know the Paerata and Pukekohe area well. My previous address was 319E Sim Road where my parents still reside. I am strongly opposed to the project in its current format and the impact it will have on my parents property and the neighbors. I do not wish this designation to go ahead for the following reasons. PROTECT FOOD PRODUCING AREAS Pukekohe is a very important food producing area in New Zealand. With climate change and population growth it is important we have the foresight to protect important food producing areas such as parts of Paerata and Pukekohe. The proposed roading plan collectively has a huge impact on smaller livestock and food producing properties. From personal experience and firsthand knowledge of the local area I can testify that many of these smaller blocks produce high quality food (organic in its nature), often feed multiple families, may be traded outside of normal food channels so difficult to capture, and most importantly food is given away to needy individuals, families and charities. As this is on a smaller basis it will not get picked up accurately on impact reports, however collectively it would add up. Examples of food I know have been grown or produced in the area for more than one household are eggs, avocado, nuts, citrus and meat. The proposed designation and the long timeframe will have a negative effect on the local community. For example many of these food production properties will cease or downscale their operations. PROTECTING NATURAL POLLINATORS HABITATS Birds, bees and bats play an important role in our ecosystem especially with regards to pollination. It is well documented that clearance of trees for urban expansion is a threat for many species including the Long-tailed bat which has the conservation status of Threatened – Nationally Critical. This bat has been recorded in the area around 319E Sim Road. I am opposed to development on and around 319E Sim Road to protect their eco system. PRESERVE OLDER TREES I am opposed to any development where trees are unnecessarily felled and habitats lost. There were many beautiful trees in the neighborhood which I note are slowly being felled on rural

land adjacent to developments. My family would like to see the Redwood tree on 319E Sim Road which we believe is over 100 years old preserved. COST OF PROJECT As an Auckland City Council rate payer and NZ tax payer I object to the cost which will be incurred for new arterial roads when we are trying to reduce our carbon footprints. I would rather see the allocated money go to maintaining and improving existing roading infrastructure. Therefore I object to the new roading section from Sim Road to Drury when there is already a route on SH22 that could be utilized and nearby rail network. Although I love the idea of cycle lanes, we should be limiting our investments in this area to projects where they are going to be utilized such as around schools and significant recreational areas. The proposed cycle lane route through 319E Sim Road is through a rural area, therefore I do not think this section will be well utilized by the masses. In summary I object to your proposed designation plan for 319E Sim Road and the associated private access road as I believe it is better suited for small scale food production and lifestyle blocks. Thank you.

I or we seek the following recommendation or decision from Auckland Council:
Preserve Redwood tree and Bat habitats on property.

Submission date: 12 November 2023

Attend a hearing

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

Declaration

I accept and agree that:

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

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:939] Notice of Requirement online submission - Bruce and Louise Postles
Date: Sunday, 12 November 2023 8:00:46 PM
Attachments: [Poistles Road Submission.pdf](#)

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

Contact details

Full name of submitter: Bruce and Louise Postles

Organisation name:

Full name of your agent: Bruce Postles

Email address: brpostles@gmail.com

Contact phone number: 021714464

Postal address:
brpostles@gmail.com
Pukekohe
Pukekohe 2676

Submission details

Name of requiring authority: Waka Kotahi NZ Transport Agency

The designation or alteration: Pukekohe : NOR 2 Drury – Pukekohe Link

The specific provisions that my submission relates to are:
The Drury- Pukekohe Link NOR 2

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

The reason for my or our views are:
Better alternatives have been explored by Waka Kotahi and ignored or not taken up. Lack of information and lack of consultation. Impact on the local residents_ practically, emotionally and financially have not been given due weight.

I or we seek the following recommendation or decision from Auckland Council:
Move the corridor west 100 m as was one of your options and in doing so make far less impact on current long term residents.

Submission date: 12 November 2023

Supporting documents
Poistles Road Submission.pdf

Attend a hearing

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

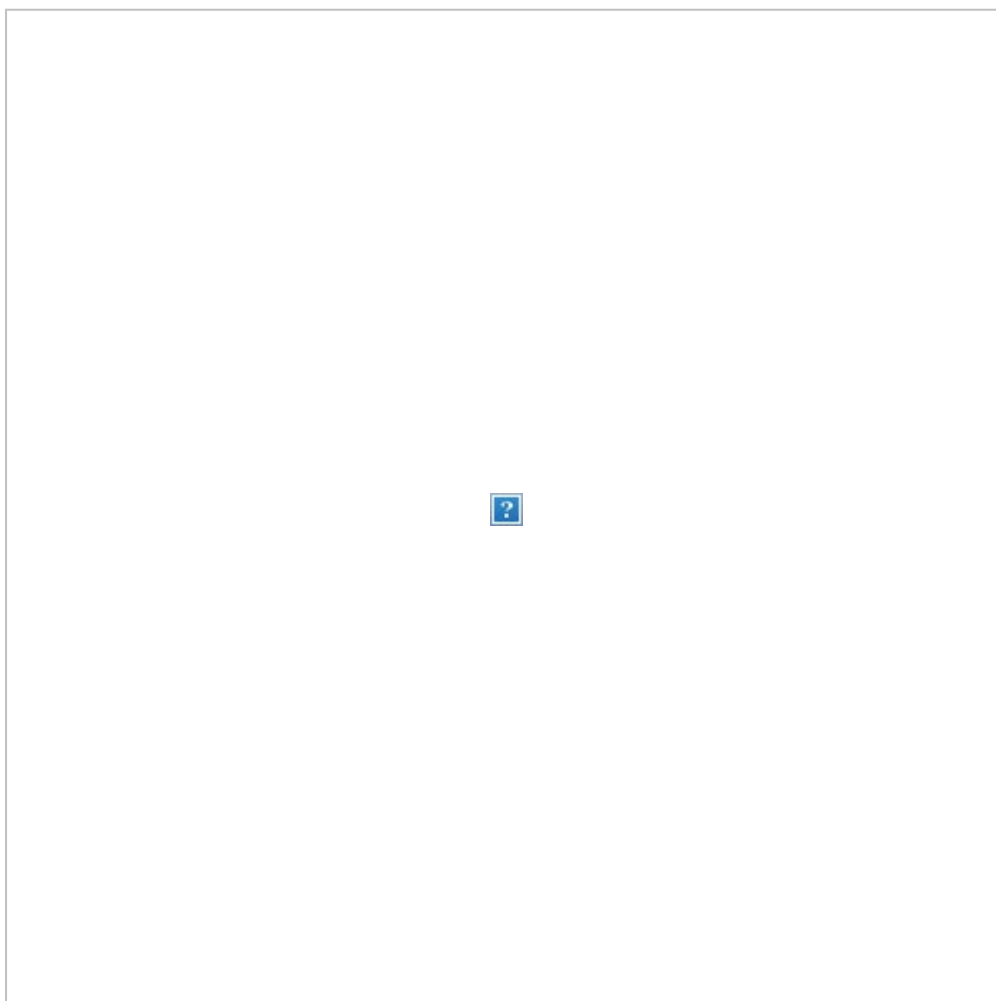
Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

I accept and agree that:

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

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



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I am writing to provide feedback on your proposed roading project (ie a submission) and the associated notices of requirements. My address is 479 Sim Road Paerata. There is not I believe a plan to take any of our property and the map supplied by you is of such a large scale it is practically of little use. I have had to source my own maps and information for a better understanding of what you intend to do which I find frustrating. The fact that there is not a notice of requirement on our property intimates that we will be unaffected which I believe is disingenuous. We live in a tranquil quiet rural location and I have owned or lived on this property for more than 55 years. At the moment I wake to bird song and tranquillity and you plan to put a highway carrying 27000 vehicle movements at our front gate. This will have a considerable impact on all who live on this road.

The road seems to curve to the South East and follow Sim road which means that your highway will have a direct impact on the six residents of Sim road at this end when this is totally unnecessary .

One of your options was to make the road straighter between us and the old Paerata school and I would implore you to reconsider this option. This would push the highway to the west 100m. This would bisect future urban land but considering the impact on the long term rate and tax paying residents it would place far less burden and distress on our local community. Surely community impact is one of the parameters that you consider when planning a major infrastructure project like this. This road is already bisecting urban, or future urban land and it is surely only a matter of time before the road will be surrounded by dwellings. I feel particular concern for my neighbour at 491 Sim Road where you plan to build a roundabout right at their front door and have a NOR to take a considerable portion of their land. This is totally unnecessary and can be completely avoided by moving the road to the west. As mentioned this was one of your options and is one that will make much less of an impact on the existing long term owners and residents of this end of Sim road.

From: [Bruce Postles](#)
To: [Unitary Plan](#); submissions@supportinggrowth.nz
Subject: Submission by Bruce and Louise Postles ref NOR2 Drury-Pukekohe Link
Date: Sunday, 12 November 2023 8:03:16 PM

I am writing to provide feedback on your proposed roading project (ie a submission) and the associated notices of requirements. My address is 479 Sim Road Paerata. There is not I believe a plan to take any of our property and the map supplied by you is of such a large scale it is practically of little use. I have had to source my own maps and information for a better understanding of what you intend to do which I find frustrating. The fact that there is not a notice of requirement on our property intimates that we will be unaffected which I believe is disingenuous. We live in a tranquil quiet rural location and I have owned or lived on this property for more than 55 years. At the moment I wake to bird song and tranquillity and you plan to put a highway carrying 27000 vehicle movements at our front gate. This will have a considerable impact on all who live on this road.

The road seems to curve to the South East and follow Sim road which means that your highway will have a direct impact on the six residents of Sim road at this end when this is totally unnecessary .

One of your options was to make the road straighter between us and the old Paerata school and I would implore you to reconsider this option. This would push the highway to the west 100m. This would bisect future urban land but considering the impact on the long term rate and tax paying residents it would place far less burden and distress on our local community. Surely community impact is one of the parameters that you consider when planning a major infrastructure project like this. This road is already bisecting urban, or future urban land and it is surely only a matter of time before the road will be surrounded by dwellings. I feel particular concern for my neighbour at 491 Sim Road where you plan to build a roundabout right at their front door and have a NOR to take a considerable portion of their land. This is totally unnecessary and can be completely avoided by moving the road to the west. As mentioned this was one of your options and is one that will make much less of an impact on the existing long term owners and residents of this end of Sim road.

Bruce and Louise Postles
479 Sim Road
RD1 Pukekohe
(Paerata)

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:945] Notice of Requirement online submission - John Ruddell
Date: Monday, 13 November 2023 8:01:05 AM

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

Contact details

Full name of submitter: John Ruddell

Organisation name:

Full name of your agent:

Email address: stuart@jbm.net.nz

Contact phone number: 0273818263

Postal address:

319c Sim Road

Paerata

Auckland 2676

Submission details

Name of requiring authority: Waka Kotahi NZ Transport Agency

The designation or alteration: Pukekohe : NOR 2 Drury – Pukekohe Link

The specific provisions that my submission relates to are:

We reside at 319c Sim Road Paerata. The submission proposes to place the road on and odd route directly through our property. This will destroy the land we have built up for agricultural purposes needlessly.

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

The reason for my or our views are:

We don't see the reason to remove usable land for the purposes of a road given the alternative routes that cause much less disruption and cost to the people (opportunity cost and long term effects should be factored in). Alternative routes are: 1 - Complete the Sim Road (Paper Road) connection with SH22 and widen SH22 2 - Road extension to be on the eastern side of Sim Road (319 a-b-c-d-e) as this would result in a straight road without a Uturn around multiple properties.

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

There has been such a lack of consultation and unfortunately it appears either done as an inside job without any major thought to the area, the land or the people within it. The Auckland council appear to be making an Auckland decision without knowing Franklin at all. Been provided with poor maps of changes with little details to establish exact location of this road. This has caused major stress and anxiety. Currently running a horse business which we have spent hundred's of thousands dollars fixing sheds, building stables, establishing paddocks for no reason at all now. This all appears to have been decided a long time ago so could have saved us a lot of money.

Submission date: 13 November 2023

Attend a hearing

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

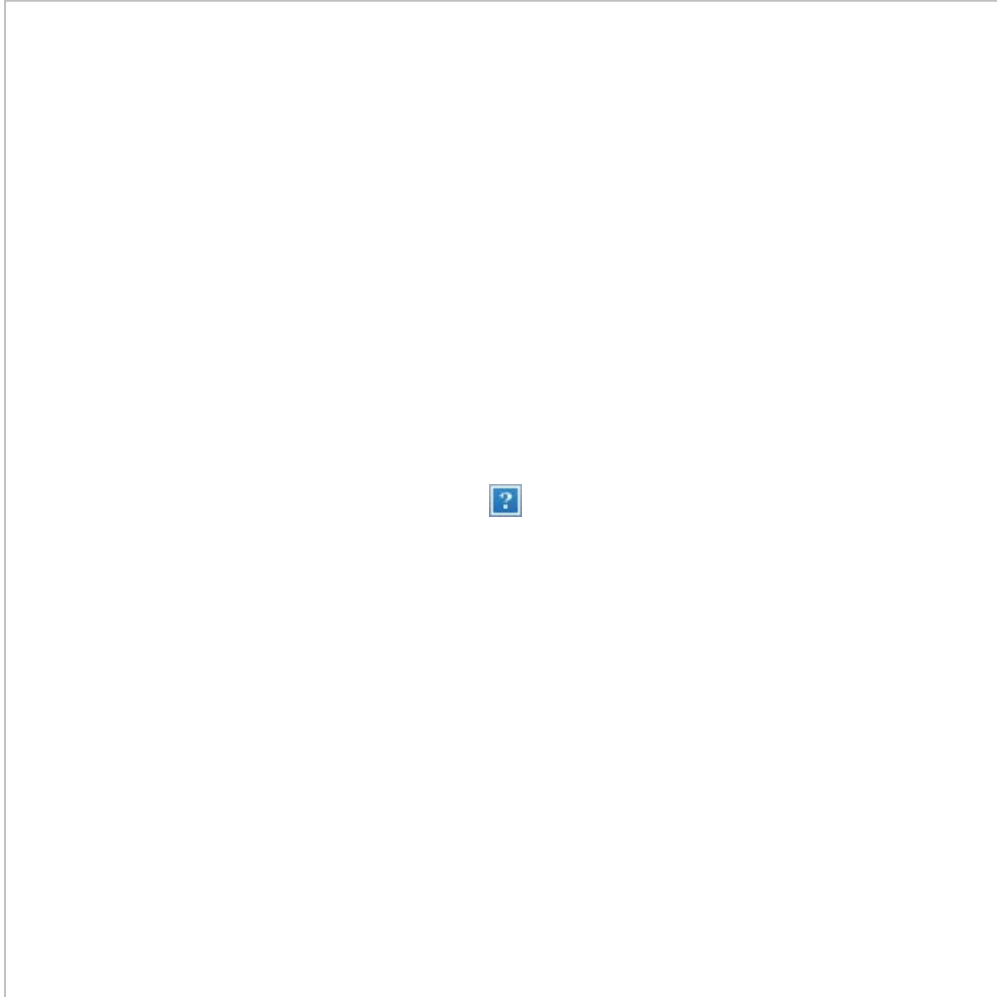
Would you consider presenting a joint case at a hearing if others have made a similar submission?

Yes

Declaration

I accept and agree that:

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



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

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



FORM 21

Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 16, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms (Full Name)

Todd Matthew Brown

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

Address for service of Submitter

397 Burff Road

RD 2 Drury, Auckland 2578

Telephone:

021 730568

Email:

thebrowns@thebigshed.co.nz

Contact Person: (Name and designation if applicable)

This is a submission on a notice of requirement:

By:: Name of Requiring Authority

Waka Kotahi NZ Transport Agency

For: A new designation or alteration to an existing designation

Pukekohe NOR 2: Drury – Pukekohe Link

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

397 Burff Road

RD2

Drury

My submission is:

I or we support of the Notice of Requirement

I or we oppose to the Notice of Requirement

I or we are neutral to the Notice of Requirement

The reasons for my views are:

As the works which would be undertaken are very close to our house we are concerned about the length of time that the works would take, and that we and our neighbours will be exposed to vibration and dust for long periods of time. We have children with allergies and this exposure could be detrimental to their health.

There are too many roundabouts proposed which could cause nothing but congestion, which in turn causes cars to be on the road for longer than they need to be, causing more pollution. The problems with Karaka road congestion will be moved over to the new expressway and made worse by slowing it all down due to all the stoppages from roundabouts

(continue on a separate sheet if necessary)

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

There needs to be further distance between existing houses on Buft Road and the new roading due to the reasons listed above
Remove the amount of roundabouts and have on and off ramps instead.

I wish to be heard in support of my submission



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



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



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

12 November 2023

Date

Notes to person making submission:

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

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

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

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

Notice of Requirement Drury – Pukekohe (**NoR 2**)

Roger Farley 31 Sim Rd Karaka 2580

Yet again I am forced to spend my time at my cost to try and protect the property we love living on against this entity called Supporting Growth. A group of theorists who sit in offices protected from those whom with the tap of a key on a keyboard destroy the hard-earned dreams and lifestyles of those impacted by that millisecond tap on a keyboard.

Sim Rd has a current average of less than 50 Vehicle movements per day and 6 on average per night 10pm to 6am and that's after the increased numbers following Paerata development creating their own short cut to their development which has resulted in our road now being akin to that travelled in a 3rd world country. **Not our problem states the developers.**

Pre COVID there was a proposal for a 4-lane expressway from Pukekohe East to Ramarama (Modelling showed it was required) with North and South sides of Sim Rd joining there was to be a rail station in the proximity to support the Paerata development. The objective with the Expressway was to take the future traffic load off Sh22 which was deemed as too complicated to upgrade to allow any increase in traffic. The Sim Rd connection was all about the rail station. COVID came along and the planned public meeting at my property was cancelled as it was planned for the day the country was locked down. The call I received from SG was to advise that this entire project was now off the table and would not now be proceeding.

Move forward 2 years and public meetings at the Franklin centre are scheduled, 2 out of the 3, I attended with one of my neighbours. The Expressway is no longer as new modelling now only calls for a 2-lane road with something like 5 roundabouts, why the change, SG can't work out how to handle the traffic into Pukekohe 30 years ahead, (their feedback). This is the team charged with planning our future transport needs and with a 30-year window they can't see a solution to traffic flow.

These meetings at best were broad bush, no detailed proposed plans presented. We left the meetings none the wiser, with no clarity of any pending impact to our properties or the roading planned for Sim Rd. Nothing presented at these public meetings wasn't already available on the web site. These meetings were not about consultation, they were a box ticking exercise by SG nothing more nothing less. For SG to claim they consulted with the community is false and totally misleading.

Invite to a one-on-one meeting.

My wife and I attended a meeting at the Franklin centre, in the course of discussion I was told, and I quote **"to stop being a Mother Hen to the street and concentrate on my own property"**. This was the theme experienced in dealing with supporting Growth over many months. Total disdain and disrespect shown by SG to those whom they were dealing with.

I questioned the designation proposed for our property which is around 50% of our property. When I asked for the designation to take in the entire property to avoid any later arguments from SG I was told this had to happen following the NOR being passed. Like you, I know this is incorrect but that was SG's position. At a later meeting SG (Helen) said the designation could be changed before the NOR was approved, I'm still waiting.

As a community minded person, I was interested in what was planned for our Road and what impact this proposed roading change would have on my Neighbours and don't appreciate being told literally to mind my own business by a rate / taxpayer funded employee. At no point following this or other meetings we attended were we provided minutes from those meetings.

Supporting Growth Management does everything they can to avoid public meetings or have their proposals questioned, i.e.

- After the initial one on one meeting my wife and I had with SG, and with the support of all residents of Sim Rd and some impacted residents from near by streets a meeting was arranged at the Sim Farm. The day before it was scheduled SG cancelled the meet citing Health and safety concerns for their team. Alan Cole deputy chair of the community Board offered to facilitate the meeting but alas the meeting was cancelled.
- We then established a small group meeting which did take place with our small group being outnumbered by the SG team, nothing was achieved. Our group wasn't concerned about our H&S even though outnumbered by the SG team.
- It had been agreed at the time of establishing the small resident's group that a public meeting for all impacted residents would still take place. SG kept refusing to meet.
- We only managed to get a public meeting after I phoned the Hon David Parker Minister of Transport and outlined our concerns. David told NZTA they had to meet with our Residents, Andrew Bayly had also been in contact with David Parker.
- Eventually the meeting took place cheered by Andrew Bayly MP and attended by Alan Cole and Andrew Baker Councillor but again hiding behind the Privacy act the large group from SG only had material on hand that is available on the Web site. No detail of proposed works. Those in attendance all opposed the proposed roading including elected officials
- At the conclusion of the meeting, I spoke to Alistair Lovel (AT) and Deepak Rama (NZTA) and asked what they would take from this meeting and add to their proposal. Deepak then told me the proposal had been submitted 3 days prior to the meeting so nothing would change. The date for the meeting was set by SG. They deliberately delayed the meeting until after the proposal was submitted to AT.

Dealing with Supporting Growth has been one of the worst experiences in my life, truth, honesty and transparency are not something this entity has in their culture, they are quick to hide behind H&S and Privacy. They present what they see as facts and when I questioned or offered options, I was promptly told everything I raised was theory. This entire process is guess work and an individual's theory with modelling numbers being changed to suit the opinion of the day.

Over the past year, along with resident's, elected officials and Councillor's have questioned the proposed roading, foot paths and cycle lanes proposed for Sim Rd with no planned connection points at Sh22, for cycle or foot path and all were ignored. These are local people with a local perspective and yet a group with no local knowledge can yet again with the tap of a key on a keyboard destroy the lively hoods and lifestyle of a community.

H&S is a concern expressed for their team regularly by SG but the proposed planed path and cycle lane for Sim Rd puts any users at great risk having to cross an 80km/hr state highway to access the foot path and cycle way twice in 700mtrs for which they show no concern.

The Sim Farm has been farmed by the same family for a 100 years, this is highly productive arable land and is currently the only Productive farm unit left on the South side of Sh.22 and north of the

Main trunk rail between Drury and Pukekohe with no plans for a zoning change. It will no longer be a commercially productive Farm if this State highway goes ahead.

I and others promoted alternatives to the use of SIM Rd and was patronised on more than one occasion by the term NIMBYism, which infuriates me. These people use this as a default if you question their thinking or offer an alternative.

The changes to Sim Rd based on the vehicle movements provided by SG will increase GHG emissions by around 5 ton daily from heavy transport alone when compared to alternate lower cost more effective options. These 5 tons of GHG, based on SG numbers comes from to between 15 and 25% of the daily vehicle movements. SG have absolutely no interest in reducing GHG emissions even stating it's not their concern. There are alternatives but would require the SG team to be open minded to considering they may be wrong.

During our public meeting SG were directed to discuss this roading proposal with the biggest transport operator in the area (**No they hadn't done so**) and did nothing until chased along by Andrew Bayly. Gleeson and Cox when contacted were quick to say they would not use SIM Rd as their first choice, they would use the most direct and shortest route.

This past week my wife and I had a meeting with SG and Align to discuss our options if we decide to exit early should the NOR be passed.

The first comment from the Align rep was what a beautiful property we had, I asked him if he would buy it with a designation on it. He was quick to say NO.

We then find that SG expect owners to advertise and try and sell their property for 3 months and only if unsuccessful do Align offer to buy the owner out. This is appalling, SG have put owners in this position, no choice of the owner, properties currently sell in 4 to 6 weeks, where SG take 4 to 6 weeks to offer and settle only after 3 months of the owner marketing their property which by the way they may not wish to move from. SO minimum of 4 ½ to 6 months before the owner can move on. This is morally and totally unacceptable and I told SG / Align this during our meeting. How can an owner who is driven out of their property find a new home with such a delayed settlement and the uncertainty of knowing what the settlement price will be for their home???

This is akin to the Land grabs early last century.

Both my wife and I have lost countless nights of sleep and spent many 100's of hours opposing this ill thought-out roading proposal. It has impacted our health and yet SG don't give a dam.

SG sit and say that they will give back a portion of our land once the foot path and cycle lanes are completed, in our case this would leave a bank of around 45 degrees that would be no use for grazing as is the current situation, our land would no longer sustain grazing any livestock as we currently do.

Sure, it is necessary to improve infrastructure, but SG is clearly incapable of creating a workable solution, is closed minded and not willing or prepared to consider any viewpoint that isn't their own. This is demonstrated by their total unwillingness to meet the communities hiding behind both H&S and the Privacy act. Sorry but this is Bull Shit.

This proposal is a complete waste of Tax / Rate payers funding, poorly thought out would provide a disastrous environmental outcome and a poor transport solution and needs to be stopped before more time and money is wasted.

Supporting Growth as an entity is ineffectual, dishonest, dismissive, derisive, divisive and needs to be disbanded. Infrastructure needs to be driven from the local level to meet local needs not from faceless offices in Auckland or Wellington.

I agree this is an emotive submission and I make no apologies for that as this process from our position is full of emotion and stress.

I urge the commission to stop this ill-thought-out proposal for Sim Rd from happening and thank you for your support in doing so.

I do wish to speak to this submission.

Roger Farley

31 Sim Rd

Karaka

021476437

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:947] Notice of Requirement online submission - Glen McCall
Date: Monday, 13 November 2023 12:01:24 PM

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

Contact details

Full name of submitter: Glen McCall

Organisation name:

Full name of your agent: glen james McCall

Email address: glenmccall@msn.com

Contact phone number: 0274711483

Postal address:

glenmccall@msn.com

Paerata

Auckland 2676

Submission details

Name of requiring authority: Waka Kotahi NZ Transport Agency

The designation or alteration: Pukekohe : NOR 2 Drury – Pukekohe Link

The specific provisions that my submission relates to are:

229 Cape Hill Road NOR 2,NOR 4

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

The reason for my or our views are:

Our generational family farm of 72 years will be dissected into three parts. My dairy farming and Ag contracting business will cease as all shedding and cowshed area are required. Our generational Family Homestead will also disappear in area required. All five houses on the property will disappear in required area. Also they are requiring our bush block for reasons unknown. The area required way exceeds mere roading. Our next children will not be able to farm the property. The area is zoned future urban. I made a submission back in 2020 on positioning of road with no response. There has been a lack of consultation with my Family and no will to look at other less invasive options of positioning of the road, infact we merely get more notices of more land required. Our Family deeply oppose this NOR

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

-Investigation into positioning road to follow the railway line which will minimise impact to numerous affected parties -Further consultation

Submission date: 13 November 2023

Attend a hearing

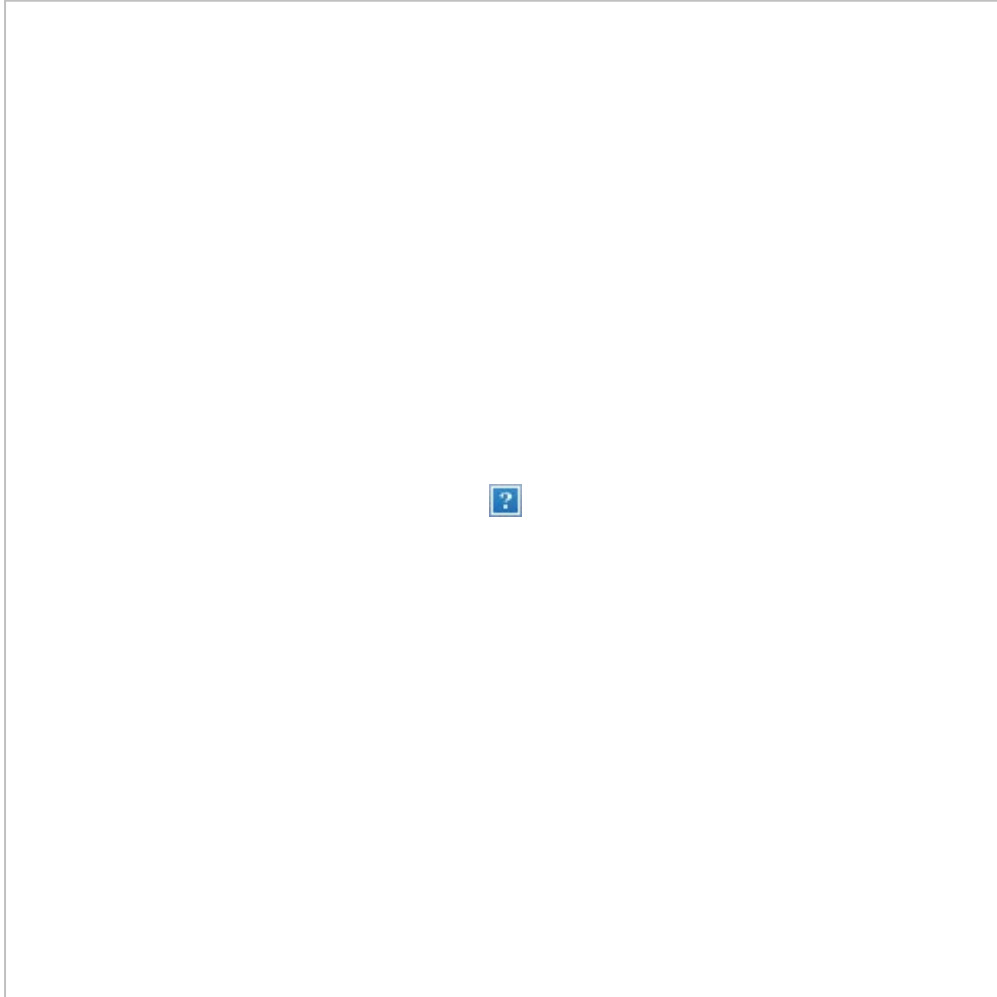
Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
No

Declaration

I accept and agree that:

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



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From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:951] Notice of Requirement online submission - DAVID AND SUE CARPENTER
Date: Monday, 13 November 2023 12:46:09 pm
Attachments: [Submission to WK re designation '23.pdf](#)

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

Contact details

Full name of submitter: DAVID AND SUE CARPENTER

Organisation name:

Full name of your agent: JULIAN DAWSON - BARRISTER

Email address: JULIAN@RMALAWYER.CO.NZ

Contact phone number: 0274200223

Postal address:
PO BOX 531

WHANGAREI 0140

Submission details

Name of requiring authority: Waka Kotahi NZ Transport Agency

The designation or alteration: Pukekohe : NOR 2 Drury – Pukekohe Link

The specific provisions that my submission relates to are:
AS PER ATTACHED DOCUMENT

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

The reason for my or our views are:
ATTACHED

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

Submission date: 13 November 2023

Supporting documents
Submission to WK re designation '23.pdf

Attend a hearing

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

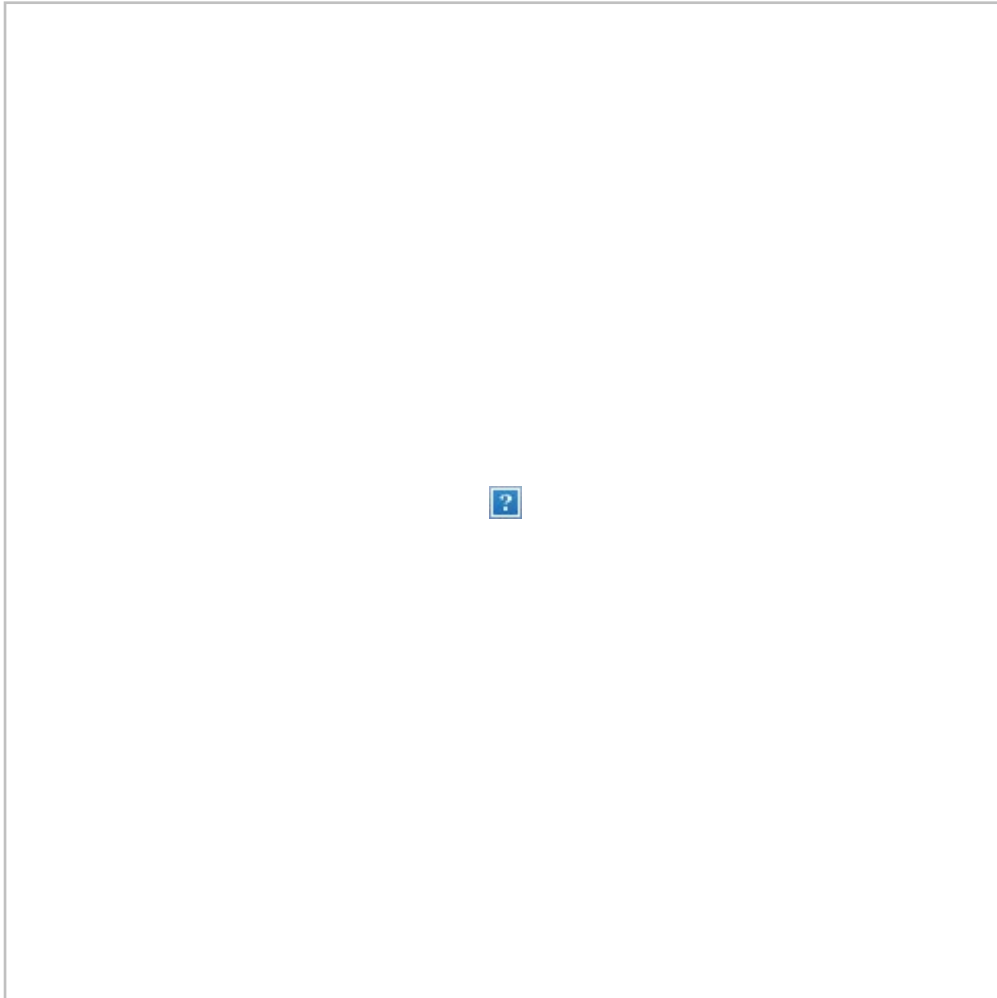
Would you consider presenting a joint case at a hearing if others have made a similar submission?
No

Declaration

I accept and agree that:

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

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



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491 Sim Road

RD1

Pukekohe

2676

7th November 2023

To whom it may concern

As joint owners of the above property, over almost four decades, we are **opposed** to the current draft plan/designation using our land for a proposed roading project and wish to make the following submission for consideration.

We oppose acquisition for a variety of reasons including the following:

- 1) **Cultural and spiritual significance**-four generations of family have called this land 'home' over 56 years; unborn children and whenua are buried here; our stories and our family history are here; this is our tangata whenua-our roots go down into this land.
- 2) **Our land feeds us**- we have animals, gardens and orchards which provide a year-round food supply, not only to our family, but those in need in the surrounding community. This will be destroyed if the project proceeds.
- 3) Our home is/was **a legacy project** where we have raised six children, where eleven grandchildren love to spend time and in which we invested approximately 500K in 2019, to future-proof it for retirement, which we now feel is money wasted. Our retirement plans have been scuttled and we have no idea what to do next.
- 4) This plan **removes reasonable and practical access** to our property and makes it significantly less useful i.e. the farm gate access(**Gate 1**); for animal movements on and off the block for buying, selling, shearing, docking, health checks and veterinary visits ; for large machinery to do tree pruning and eventual harvesting of a pine plantation block which we planted three decades ago ; for machinery to do mowing and weed control management; to 4 wheel drive vehicles and farm bikes for the purpose of collecting wood and pine cones for our home wood burner; access to an offal pit at the bottom of our block where we can dispose of dead animals when required.

It also removes the in/out current drive-through access (**Gate 2**) to our home which we use on a weekly basis to host various groups and extended family occasions; access for trailers, motorhome, and wood-splitting events. There is precious little flat land close to the house.

- 5) My father (Susan), when cutting his dairy farm up into blocks 36 years ago, gave us the opportunity to move our young family back 'home' for **a quiet, peaceful lifestyle** and to provide 'leg-room' for his grandchildren/our young and growing family. At the time we moved from town and have no desire currently to be part of a new developing urban area, adjacent to a main arterial route.
- 6) The stress imposed on our health, by, in the first instance, **anxiety and uncertainty over the project** exacerbating/triggering a past PTSD diagnosis in David and secondly once the project commences the noise and vibrations of construction, for us both, but particularly David who had a heart attack in 2022 and has been strongly advised by his cardiologist to avoid on-going stress. It would simply make life here unbearable for us.

We have lately experienced weeks of truck & trailer units accessing Sim Rd, to deliver hundreds of tonnes of metal for the new Paerata station. This gave us an insight into potential noise levels, resultant stress levels and the implications of a major arterial route with many thousands of vehicle movements per day, all this exacerbated by unreasonable proximity to a large round-about. We could not exist in what would be a radically transformed environment and any amenity will be lost completely.

- 7) In our view there are other design options that would remove the project from our property and the adverse effect on it altogether. However, as it stands, our property and house will be uninhabitable.

In conclusion, for all the above reasons and more, nothing short of a total acquisition of our property would enable us to move forward with any sort of peace of mind.

We therefore seek that:

1. The Notice of Requirement be withdrawn in its entirety; or
2. That our property be Designated in its entirety;

3. That our property be acquired and compensation paid straight away;
4. Such other consequential relief as may be necessary to address our concerns.

Kind regards

Susan & David Carpenter.

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:954] Notice of Requirement online submission - Zhaoyang Xin
Date: Monday, 13 November 2023 2:16:09 pm

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

Contact details

Full name of submitter: Zhaoyang Xin

Organisation name: XLU limited

Full name of your agent:

Email address: stevexin9@gmail.com

Contact phone number: 0291269590

Postal address:
G05/428 Dominion Road,
Mt Eden
Auckland 1024

Submission details

Name of requiring authority: Waka Kotahi NZ Transport Agency

The designation or alteration: Pukekohe : NOR 2 Drury – Pukekohe Link

The specific provisions that my submission relates to are:
319B Sim Road, Paerata, Pukekohe

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

The reason for my or our views are:

The property value will be decreased severely. The designation implemented on the property fully makes no possibility to renovate or build a house on it since NOR2 takes all the areas into the designation areas. Have spoken to the stuff of the Supporting South team and ask them to reconsider the designation areas taken from this road corridor, but this property is still added into the designation areas 100% even if the road planned just bites this property a little bit from the drawing set.

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

Please consider the reduce the designation areas applied on this property and ensure an opportunity to renovate the existing house or build a new house without decreasing this property value.

Submission date: 13 November 2023

Attend a hearing

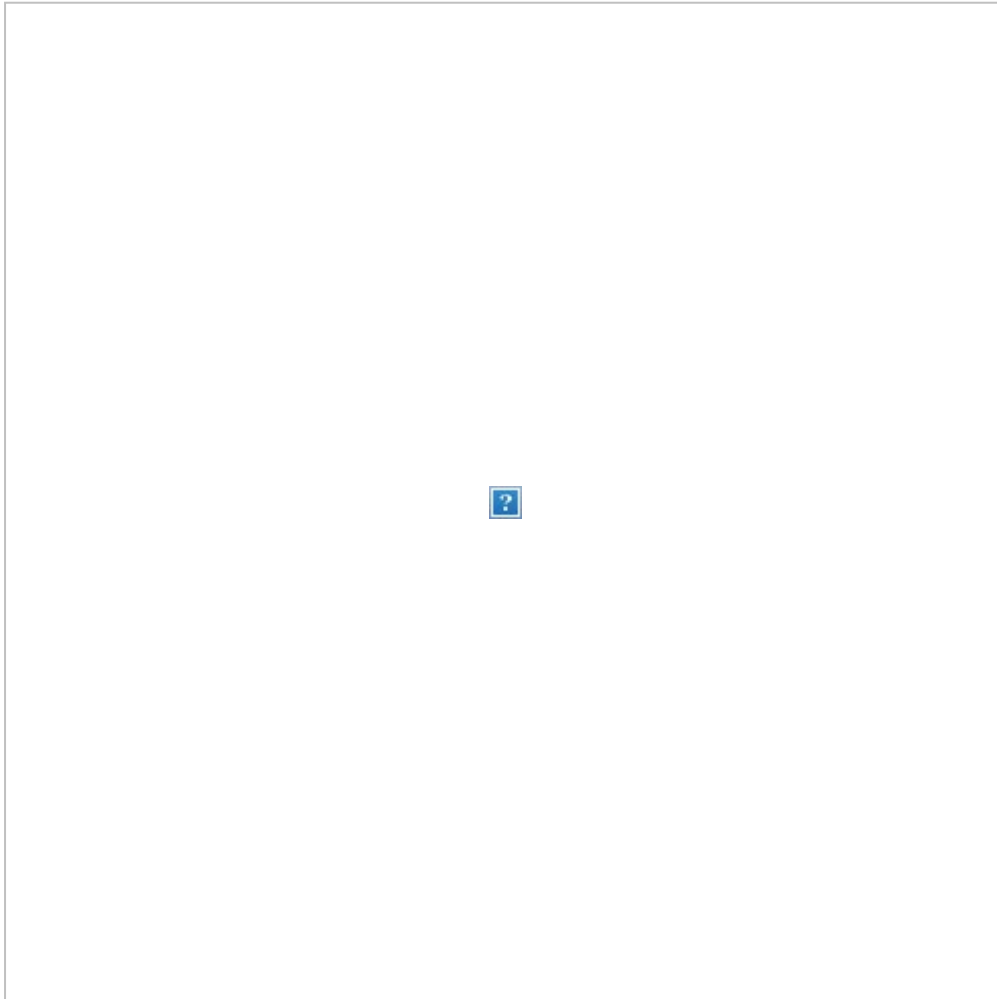
Do you wish to be heard in support of your submission? Yes

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

Declaration

I accept and agree that:

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



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From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:955] Notice of Requirement online submission - Michael Colin Dane
Date: Monday, 13 November 2023 2:16:11 pm
Attachments: [NoR 2 submission.pdf](#)

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

Contact details

Full name of submitter: Michael Colin Dane

Organisation name:

Full name of your agent:

Email address: mcdane53@icloud.com

Contact phone number:

Postal address:

111 Sim Road
Paerata
Auckland 2580

Submission details

Name of requiring authority: Waka Kotahi NZ Transport Agency

The designation or alteration: Pukekohe : NOR 2 Drury – Pukekohe Link

The specific provisions that my submission relates to are:

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

The reason for my or our views are:

Refer to attached document

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

Refer to attached document

Submission date: 13 November 2023

Supporting documents

NoR 2 submission.pdf

Attend a hearing

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

Declaration

I accept and agree that:

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

NoR 2: Drury - Pukekohe Link

Submission

This submission only relates to the proposed changes to the Sim Road section of the plan from where Sim Road intersects with SH22 and connection to the new roundabout at the Drury - Paerata segment of the new State Highway from Drury to Pukekohe.

My principal objection is that the plan has proceeded to this point without proper consultation of the surrounding community. This would appear to go against all reasonable expectations of what constitutes proper procedures of consultation with the community.

The NoR was notified on 13-10-23 but it was not until some weeks prior that Sim Road residents generally became aware of the extent of the proposed changes. A community meeting was hastily arranged with Supporting Growth (SG) attended by the majority of the Sim Road community, where SG briefly outlined an overview of the plan. Very little detail was provided and none of the community's concerns were properly addressed by SG.

Since notification the community has one month (until 13-11-23) to make submissions. I have subsequently found 18 significant documents (online) pertaining to the proposal, generally comprising of various reports and plans. As far as I am aware none of this information had been made available previously to the community. To properly assess this data, I estimate that the community would require in the order of 12 months for independent experts to review the part of the proposal where it affects Sim Road.

In light of the woeful attempts by SG to engage the local community, I suggest that Auckland Council postpone any decision on the approval of NoR 2, or alternatively put a "hold" on the Sim Road link, section of NoR 2. In order to make an informed decision then Auckland Council should initiate a full peer review of the Sim Road section of the NoR and ensure the entire Sim Road community is kept fully informed.

From: [Raewyn Berry](#)
To: [Unitary Plan](#)
Subject: 481 Sim Road
Date: Monday, 13 November 2023 4:00:02 pm

To Whom It May Concern

We are writing to provide feedback on your proposed roading project submission and the associated notices of requirement.

Our address is 481 Sim Road Paerata

We have lived on this property for 38 years and have loved our quiet rural lifestyle. We also love to sleep with our windows open and are worried with all the extra traffic and noise will have a significant impact on our sleep and health.

If you are planning to go through the Dairy Company land surely you can move the road further away from our properties. One of your proposals was to have it more to the West surely this would be more of a logic option.

We also feel particularly concerned for our neighbours at 491 Sim Road where you plan to build a roundabout right by their front door, this is absolutely ludicrous and completely avoidable.

Also we have mentioned before you could follow the railway line, you have made a service lane by this, surely you could utilise this as a better option for all concerned.

Thank you

PD & RA Berry

Sent from my iPhone

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

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



FORM 21

Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 16, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

Katie Wright

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

Fisher & Paykel Healthcare Limited

Address for service of Submitter

15 Maurice Paykel Place, East Tamaki, Auckland 2013

Telephone:

21797932

Email:

katie.wright@fphcare.co.nz

Contact Person: (Name and designation if applicable)

This is a submission on a notice of requirement:

By: Name of Requiring Authority

Waka Kotahi NZ Transport Agency

For: A new designation or alteration to an existing designation

Pukekohe NOR 2: Drury – Pukekohe Link

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

Refer to attached submission.

My submission is:

I or we support of the Notice of Requirement

I or we oppose to the Notice of Requirement

I or we are neutral to the Notice of Requirement

The reasons for my views are:

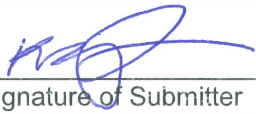
As set out in the attached submission.

(continue on a separate sheet if necessary)

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

As set out in the attached submission.

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



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

11/13/2023
Date

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

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

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

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

Submission on Pukekohe: Drury – Pukekohe Link (NOR 2)

To: Auckland Council

SUBMITTER DETAILS

Name of Submitter: Fisher & Paykel Healthcare Limited (F&P)

1. F&P makes this submission on a notice of requirement lodged by Waka Kotahi NZ Transport Agency for a new state highway, entitled Pukekohe: Drury – Pukekohe Link (NOR 2) (**Project**).
2. F&P wishes to be heard in support of its submission.
3. If any other submitters make a similar submission, F&P will consider presenting a joint case with them at the hearing.
4. F&P could not gain advantage in trade competition through this submission.

Overview of F&P

5. F&P has an interest in the Project that is greater than the interest that the general public has.
6. F&P is a leading designer, manufacturer and marketer of healthcare products and systems for use in acute and chronic respiratory care, surgery and the treatment of obstructive sleep apnea.
7. F&P's direct subsidiary is the owner of a significant landholding (105 hectares) in close proximity to the proposed location of the Project, which F&P intends to develop as a research and development and manufacturing campus over the next 30-40 years. This site is located at 300-458 Karaka Road, Drury (**Site**), which is approximately 2000m to the east of the proposed new intersection upgrades with Karaka Road under the Project.
8. F&P's development of the Site will generate a significant number of employment opportunities and visitors to the Site, which will result in a large number of persons travelling to and from the Site every day.
9. The Project will give rise to positive effects that will directly affect F&P, given its proximity to the Site.

Scope of submission

10. The submission relates to the Project as a whole.
11. F&P supports the Project, as it will:
 - a. support the future urbanisation and development of Drury West; and
 - b. provide existing and future residents and employees with improved walking and cycling connections with Karaka Road.

Relief sought

12. F&P seeks that the Project be approved by Auckland Council.

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

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



FORM 21

Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 16, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

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

Address for service of Submitter

Telephone: Email:

Contact Person: (Name and designation if applicable)

This is a submission on a notice of requirement:

By: Name of Requiring Authority

Waka Kotahi NZ Transport Agency

For: A new designation or alteration to an existing designation

Pukekohe NOR 2: Drury – Pukekohe Link

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

My submission is:

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

The reasons for my views are:

(continue on a separate sheet if necessary)

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

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

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

Date

Notes to person making submission:

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

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

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



FORM 21

Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 16, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) Peter Sim

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

Trevlyn Enterprises

Address for service of Submitter

83 Sim Rd, Paerata

Telephone:

274941341

Email:

moofmr@xtra.co.nz

Contact Person: (Name and designation if applicable)

This is a submission on a notice of requirement:

By:: Name of Requiring Authority

Waka Kotahi NZ Transport Agency

For: A new designation or alteration to an existing designation

Pukekohe NOR 2: Drury – Pukekohe Link

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

The dissection of our property by planned road

My submission is:

I or we support of the Notice of Requirement

I or we oppose to the Notice of Requirement

I or we are neutral to the Notice of Requirement

The reasons for my views are:

We are opposed to the planned road as it will dissect our property making it unuseable.

The property is farmed in combination with that of Sim Holdings and D&K Sim Ltd. The placement of the road will see us lose a third of the farmable property hence making the farm in totality unprofitable.

(continue on a separate sheet if necessary)

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

I wish to be heard in support of my submission

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

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

Peter Sim

11/23/2013

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

Date

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Auckland 1142

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) Peter Sim

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

Address for service of Submitter

77 Sim Road, Karaka

Telephone: Email:

Contact Person: (Name and designation if applicable)

This is a submission on a notice of requirement:

By:: Name of Requiring Authority	Waka Kotahi NZ Transport Agency
For: A new designation or alteration to an existing designation	Pukekohe NOR 2: Drury – Pukekohe Link

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

The placement of a roundabout on 77 Sim Rd, Karaka

My submission is:

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

The reasons for my views are:

Placement of a roundabout on our property will be devastating. We will be losing our home of 20 years but more importantly, a member of the Sim family has lived on the property for over 100 years.

As well as losing our home we will be losing our sheds, stable, workshop as well as our bore which is used to supply stock water to the farm which will

also be dissected by the road.

(continue on a separate sheet if necessary)

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

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

Peter Sim

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

11/23/2013

 Date

Notes to person making submission:

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

From: [derek.gates](mailto:derek.gates@supportinggrowth.nz)
To: [Unitary Plan](#); submissions@supportinggrowth.nz
Subject: Submission 36 Sim Road Karaka - Roading and Asphalt Ltd
Date: Monday, 13 November 2023 5:48:15 pm

Submission opposing the Notice of Requirement NoR 2 :Drury - Pukekohe Link (Waka Kotahi) NZTA

We totally disagree and oppose the Supporting Growth Team of the proposal of designating Sim Road from SH22 into a future State Highway, there are far better routes that should be considered.

We own 36 Sim Road 2003 (8.4590ha Lot 4 DP 117967) , and also purchased 15 Gellert Road (4.4503ha Lot 6 DP 117967) and 539 Karaka Road (0.0888ha Lot 1 DP 50927) which all properties are linked.

Sim Road is our Main Access serving our Land, and at present has very limited vehicle movement . We gave Ivan Bridge permission to rezone his Land (12 Sim Road 4.6517 Lot 5 DP 117967) to enable Ivan to build his Specialization Horse Veterinary, as Sim Road is a quiet road which is necessary for dealing with horses .

If Sim Road is made a State Highway the traffic will increase by thousands per day. We require access to bring in heavy equipment (Truck transporters , Stock trucks to move my cattle etc)

Future Development will affect 36 Sim Road. Meeting held 14th August 2023 at 372 Blackbridge Road , Karaka , Meeting Notes of SG - Landowner Key concerns, one of mind is point 1.7 "Future use of Sim Road by Parerate Rise (Grafton Downs) development " Please consider this . "Future Rezoning"
Rezoning our land 36 Sim Road and other land in Sim Road will be impossible if the road is made a State Highway.

On 3rd November 2015 I submitted on behalf of the land owners in Sim Road a late Submission to the Independent Hearing Panel for the Proposed Auckland Unitary Plan to have the land rezone from Mixed Rural to Countryside Living. We were turn down as we were late with the Submission, Bill Cashmore who was our Auckland Councilor for Franklin area advise to reapply later. This won't be possible now unless you agree.

We have submitted many Submissions ,the latest one "Help Shape Auckland's Future Growth" , closed 4th July 2023 which was submitted by my Planner Leonie Mullions, we're still waiting to hear back.

There are too many organisations involved, and a huge time, cost, and stress involved on us.

Supporting Growth Team did everything they could to avoid public meetings, SG cancelled our meeting the day before at Peter Sim house stating H&S reason. So I contacted Andrew Bayly who met Roger, Stuart and Myself at short notice and Andrew arranged for SG to have a Public meeting otherwise it wouldn't have happened . SG then arranged a meeting (Date & Time) for 14th August 2023. I believe the proposal had already been submitted 3 days prior to the meeting so nothing would change.
This is nothing short of dictatorship and absolutely no consideration for us Landowners.

As a Surveyor and Engineer for a Council for 13 years and in Business as Contractor for

39 years, this proposal designating Sim Road to a State Highway is a complete waste of Taxpayers money , process not carried out correctly , poor transport solution, poorly designed, disastrous for the environment - steep incline - roundabouts, noisy to the quiet existing area , and Sim Road is not a suitable route for an East-West State Highway Link and should be stopped immediately before more money and time is wasted.

I ask the Commission to please stop the proposal of making Sim Road a State Highway .

We do want to speak at the hearing.

Regards
Jennifer & Derek Gates
Roding & Asphalt Ltd
Cell 021932223`

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

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



FORM 21

Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 16, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only

Submission No:

Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) Mr Ian Campbell

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

Public Works Advisory Limited

Address for service of Submitter

Level 8 139 Quay Street Auckland

Telephone:

274770486

Email:

ian@publicworksadvisory.co.nz

Contact Person: (Name and designation if applicable)

This is a submission on a notice of requirement:

By: Name of Requiring Authority

Waka Kotahi NZ Transport Agency

For: A new designation or alteration to an existing designation

Pukekohe NOR 2: Drury – Pukekohe Link

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

Our submission relates to residential dwellings fully impacted by the NoR2 Drury - Pukekohe Link land requirement. Residents who are fully impacted by the General Arrangement Layout plan will experience significant challenges caused through planning blight over the proposed 20 year designation period.

My submission is:

I or we support of the Notice of Requirement



I or we oppose to the Notice of Requirement

I or we are neutral to the Notice of Requirement



The reasons for my views are:

We seek an amended to the conditions to address residential dwellings that are fully impacted by NoR2.

NoR2 comprises 62 parcels. A significant portion involve residential dwellings in part or in full.

Although s185 RMA is available to provide advance purchase relief, the NZTA mechanism for achieving a timely outcome in practice, is imperfect.

(continue on a separate sheet if necessary)

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

We recommend priority is given to residential dwellings fully impacted by the NoR2.

We seek Waka Kotahi/ NZTA voluntarily invites full acquisition in these specific cases and does not enforce a minimum 3 month marketing period under its Advance Purchase policy.

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

I G Campbell

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

11/13/2023

Date

Notes to person making submission:

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

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

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:961] Notice of Requirement online submission - John Christopher Thompson
Date: Monday, 13 November 2023 9:16:15 pm
Attachments: [Submission opposing the Notice of Requirement NoR 2.pdf](#)

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

Contact details

Full name of submitter: John Christopher Thompson

Organisation name:

Full name of your agent: John Christopher Thompson

Email address: john.thompson@xtra.co.nz

Contact phone number: 0274930199

Postal address:
72 Sim Road
Karakā R.D. 1
Papakura 2580

Submission details

Name of requiring authority: Waka Kotahi NZ Transport Agency

The designation or alteration: Pukekohe : NOR 2 Drury – Pukekohe Link

The specific provisions that my submission relates to are:

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

The reason for my or our views are:
Please refer to the Submission file attached

I or we seek the following recommendation or decision from Auckland Council:
We request removing the Notice of Requirement for our property at 72 Sim Road, Karakā R.D.1, Papakura and confirm this has been completed.

Submission date: 13 November 2023

Supporting documents
Submission opposing the Notice of Requirement NoR 2.pdf

Attend a hearing

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

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

Declaration

I accept and agree that:

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

Submission opposing the Notice of Requirement NoR 2: Drury – Pukekohe Link (Waka Kotahi (NZTA)).

Reasons for opposing this proposed new state highway link are numerous and include critical design flaws, failures and omissions.

The proposal fails one of NZTA's stated priorities namely to improve freight efficiency.

The same proposal fails the broader outcomes of NZTA planning and investment functions in the pursuit of secondary benefits namely environmental outcomes that are generated.

Additionally the proposed route fails to deliver on one of NZTA's primary functions namely sustainability.

Very importantly this proposal fails to provide for the needs of the local community on almost all fronts and fails to support NZTA vision statement: "Where transport improves our health and wellbeing, creates liveable places for our communities".

- Flaws – Efficient movement of vehicles is essential to the survival of businesses employing our community. Stop-start traffic is unavoidable at roundabouts. This is especially so when a roundabout is at the top of a rise. The proposed link using Sim Road with roundabouts will cause significant delays to freight delivery and effectively act as a disincentive for all drivers to use the link which is the essence of changes to this road.
- Failures- Transparency: Failure to consult with the local community with sufficient transparency to enable its members to fully understand the outcome of the proposed project and facilitate the community's ability to make informed submissions.
Effective consultation: Failure to consult with industry and business leaders on their current and future transport requirements.
Candid consultation: Failure to adequately explain during consultation with affected parties what the proposed changes and likely outcomes/realistic implications will mean to them and the surrounding neighbourhood.
- Omissions - Fails to address health and safety of residents along the proposed route especially with respect to increased pollution when vehicles have an up-hill approach to a roundabout.
There has been nothing in the design detail to suggest how increased noise or exhaust fumes will be mitigated.
These omissions suggest the project has not been adequately managed and designers have not met the minimum standards of familiarising themselves adequately with the district, its community, its activities and crucial aspect of its sustainability.
- Submission - Sim Road is not a suitable route for an East-West state highway link and thus NoR 2: Drury – Pukekohe Link is not in the public interest.

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:967] Notice of Requirement online submission - Pam Butler Senior RMA Advisor KiwiRail
Date: Monday, 13 November 2023 10:01:16 pm
Attachments: [KiwiRail submission\(s\) Pukekohe package NoRs 1-5_20231113214818.149.pdf](#)

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

Contact details

Full name of submitter: Pam Butler Senior RMA Advisor KiwiRail

Organisation name: KiwiRail Holdings Limited

Full name of your agent: KiwiRail Holdings Limited

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

Contact phone number: 0275708571

Postal address:
Private Bag 92138
Auckland 1142

Auckland 1142

Submission details

Name of requiring authority: Waka Kotahi NZ Transport Agency

The designation or alteration: Pukekohe : NOR 2 Drury – Pukekohe Link

The specific provisions that my submission relates to are:
Railway designations in Sth Auckland

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

The reason for my or our views are:
see attached

I or we seek the following recommendation or decision from Auckland Council:
Recommend approval subject to proposed conditions

Submission date: 13 November 2023

Supporting documents
KiwiRail submission(s) Pukekohe package NoRs 1-5_20231113214818.149.pdf

Attend a hearing

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

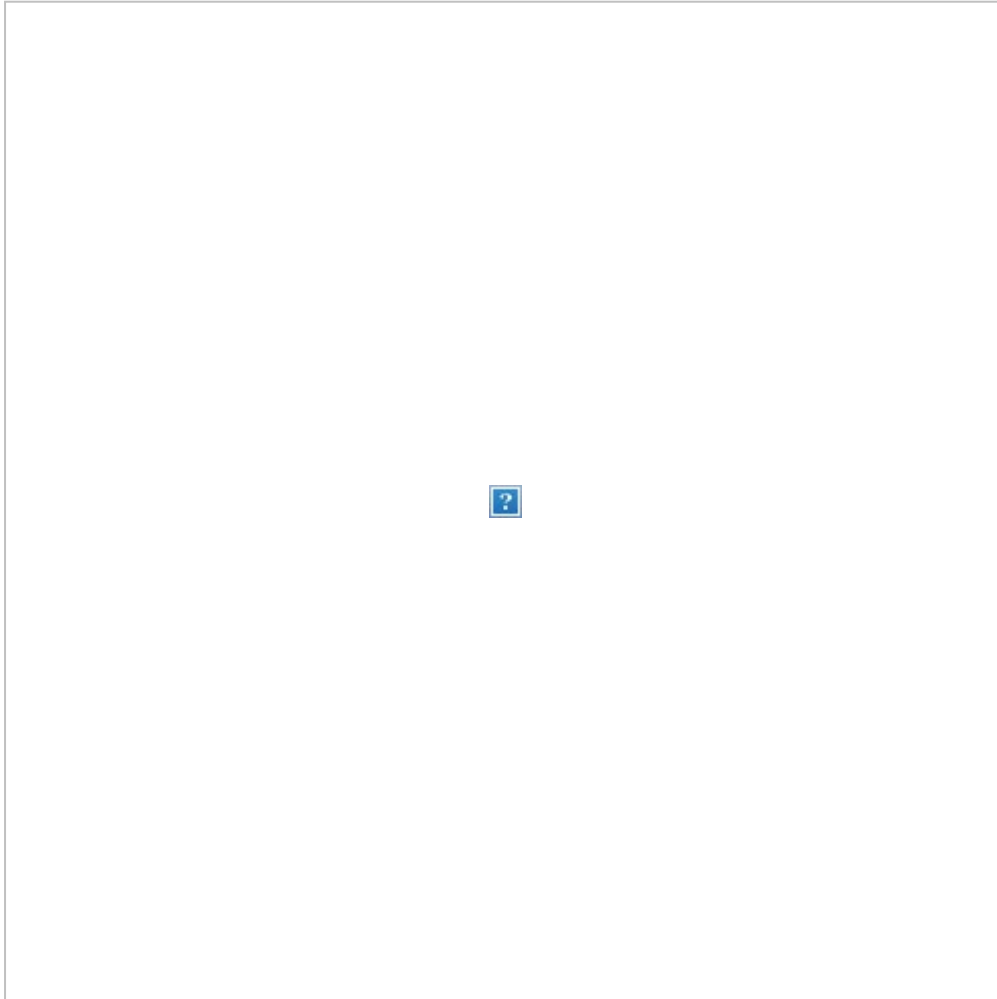
Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

I accept and agree that:

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

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



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13 November, 2023

Reason for submission

KiwiRail is the State Owned Enterprise responsible for the management and operation of the national railway and Interislander ferry services. In many places, the rail network has been in place for over 100 years and remains crucially important to the economic and social development of the areas it services. The rail network serves two functions as a metropolitan public transport service in Auckland and Wellington primarily, and a route for freight and other services nationally.

The land upon which the rail network operates is owned by the New Zealand Railways Corporation and leased to KiwiRail. KiwiRail owns the rail infrastructure (including rails, sleepers, sidings, and depots) and is a railway operator for the purposes of the Railways Act 2005. It is also the licensed Access Provider under the Railways Act, which provides KiwiRail broad powers to safely control and restrict the use of railway assets and entry onto railway land.

KiwiRail Holdings Limited (KiwiRail) is working closely with Auckland Transport (AT) and Waka Kotahi (WK) to develop the strategic transport network to support Auckland's growth areas, particularly in the south. KiwiRail owns and maintains Auckland's Metro track network and is currently well into delivering major southern projects including electrification between Papakura and Pukekohe and, three new Drury stations (Drury, Ngākōroa and Paerātā), and will shortly embark on work to add capacity to the NIMT (North Island Main Trunk).

A functioning and efficient freight network is critical to the productivity of the nation's supply chain. KiwiRail also operates New Zealand's rail freight network and tourism passenger rail services between Auckland and Wellington and the Te Huia Hamilton – Auckland passenger service, which began in April 2021. Further interregional passenger growth is predicted. KiwiRail therefore has a significant interest in planning to enable the efficient flow of imports, exports, and domestic goods within and through the region. Freight tonnage is forecast to treble to, from and through the region over the next 25 years.

KiwiRail is part of Auckland's wider transport family and fully supports the development of efficient and accessible Rapid Transport Networks (RTN), Active Mode Corridors (AMC) and road /highway networks which facilitate mode transfer and enable future urban growth.

The proposed Notices of Requirement (NoRs) cross designations for which KiwiRail is the requiring authority. Of key interest to KiwiRail is the intersection of the proposed designations with the existing rail corridor. These locations are shown on Table One overleaf.



Table One: Affected KiwiRail locations summary

NoR ¹	Affected KiwiRail site	Purpose and corridor impacts
Drury West Arterial NoR 1 (AT)	Designation 6302, NIMT, Burt Road	Proposed bridge as part of new transport corridor
	Drury West / Ngaakooroa Station; extends south from Ngaakooroa Rail Station	Tie in and upgrade the proposed station access way to provide for bus priority lanes. This arterial will connect the FUZ south of SH22 (State Highway 22) with the new rail station.
Drury – Pukekohe Link NoR 2 (Waka Kotahi)	Designation 6302, crosses the NIMT to connect to SH22	SH22 connection.
	Designation 6311 Paerata Interchange	Paerata Interchange and Accessway: Provides a connection to the Paerata Rail Station from Sim Road (south) proposed to be upgraded by NoR 2.
Paerata Connections NoR 3 (AT)	Designation 6310, Paerata Station	
	Designation 6311 Paerata Interchange	
Paerata Connections NoR 3 (AT)	Designation 6302, NIMT (end of Sim Road)	Paerata Interchange and Accessway: Sim Road segment.
	Designation 6302, crosses the NIMT at Paerata (near Butcher Road)	Proposed bridge as part of new transport corridor.
Pukekohe North-East Arterial NoR 4 (AT)	Designation 6302, crosses the NIMT in Pukekohe (south)	To connect to Svendsen Road / Wrightson Way.

As KiwiRail is the Requiring Authority for the earlier designation/s, approval under s177 of the Resource Management Act 1991 (RMA) is required for the secondary requiring authority to undertake works within the railway corridor. KiwiRail acknowledges that the NoR AEE(s) identify that further engagement with KiwiRail will continue as the Project is developed. KiwiRail expects that as part of that process the necessary approvals will be sought in due course.

The importance of planning for the future growth of both RTN and post CRL (City Rail Link) metro rail services and enabling the growing demand for freight movements and interregional rail services to, and through Auckland has emerged as a result of the work undertaken to date as part of the preparation of these NoRs.

Aligned with its broader national role, KiwiRail, AT, Auckland Council and WK are starting to plan for future rail investment to - remove capacity constraints, raise future passenger and freight levels of service to drive increases in rail mode share, and enable greater network reliability and resilience by improving maintenance options (without having to close lines for extended periods).

¹ NoR's 6, 7 and 8 are some distance from railway assets.

Specific areas that are of greatest interest to KiwiRail and around which further detail will be required prior to granting any s177 approval, include:

- a) That KiwiRail's strategy for growing the capacity and resilience of the NIMT through the provision of additional tracks is acknowledged and accommodated as far as possible in the development and design of the Project
- b) NoR alignments which restrict or challenge emerging rail corridor options are addressed in advance of starting detailed design
- c) All safety and operational concerns arising from structures over and adjacent to the rail corridor are mitigated, including but not limited to ongoing effects on corridor stability.

Several of these initial issues are set out in Table Two below.

Table Two: NoR created constraint and suggested approach.

• NoR	Issue	• Resolution
1	Allows for an increase of track and rail maintenance access however limited flexibility for changes in rail design standards and further development	Ongoing dialogue and engagement before detailed design starts
2	Allows for an increase of track capacity however limits provision of maintenance access to improve resilience	Ongoing dialogue and engagement before detailed design starts
3	Allows for an increase of track capacity however limits provision of maintenance access to improve resilience	Ongoing dialogue and engagement before detailed design starts
4	No evident issues. Cuts near the Mission Bush corridor can be managed to protect for growth. However, the form that the bridge takes for this span and the impact of the structure on the current and future rail infrastructure will need to be agreed.	Ongoing dialogue and engagement before detailed design starts

<p>5</p>	<p>The proposed road bridge over the NIMT and Station Road is shown as a long single span which may not be practically feasible. There is a risk a central pier (or piers) is required and depending on the location may hinder future rail options</p> <p>There have been new high-speed crossovers installed as part of P2P just south of the new overbridge. There is potential that a 3rd and 4th track may be added to the NIMT from Pukekohe to these cross overs as part of the southern approach to the eventual Pukekohe to Papakura 4 tracking.</p> <p>Electrification of the rail network to Hamilton is a strong likelihood. Depending on the extent and proximity of any additional cross overs in a southern cluster, they may drive higher than normal OLE (Overhead Line Equipment) clearances under new road bridge.</p>	<p>Ongoing dialogue and engagement before detailed design starts</p> <p>Clarify potential location of Station Rd bridge support piers</p> <p>Ongoing dialogue and engagement before detailed design starts</p> <p>Future corridor OLE equipment clearance under full width of span needs to be clarified</p>
-----------------	---	--

Relief sought

KiwiRail generally supports NoR applications One to Five and seeks that the Notice of Requirement be recommended for approval by Auckland Council subject to the applicant's proposed conditions, including in particular

- Condition 5 (All NoRs)– Network Utility Operators (s176 approval) to carry out routine works
- Condition 10 (All NoRs) - (Land Integration Process LIP)) which enables developers and agencies to seek the latest information to enable better planning and integration with the NoRs. It is suggested that the condition be altered at (c) (i) to add the word 'available' before 'designs' as there will be a limit about what information is available for the various packages during the designation term. For example, at preliminary design, 50% design, approved, or final design.
- Condition 11 UDLMP (Condition 11 for NoR 5) – to enable integration of the Project's permanent works into the surrounding landscape and urban context, of which KiwiRail's new stations will form part.
- Condition 26 (all NoRs) Network Utility Management Plan (NUMP) setting out a framework for protecting, relocating and working in proximity to existing network utilities.

13 November 2023

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of a submission to the **AUCKLAND COUNCIL** by **MCKEAN FAMILY TRUST** in support to Pukekohe: Drury West Arterial (NoR 1) lodged by **AUCKLAND TRANSPORT** to designate land for the Pukekohe Transport Network

SUBMISSION BY THE MCKEAN FAMILY TRUST IN RELATION TO TWO NOTICES OF REQUIREMENT ISSUED BY AUCKLAND AND WAKA KOTAHI / NZ TRANSPORT AGENCY RELATING TO TRANSPORTATION PROPOSALS IN THE DRURY-PUKEKOHE AREA

To: AUCKLAND COUNCIL

1. This submission is lodged in by **MCKEAN FAMILY TRUST** ("MFT" or "Submitter") in respect of two notices of requirement ("NOR") issued by **AUCKLAND TRANSPORT** ("AT") and **WAKA KOTAHI NZ TRANSPORT AGENCY** ("WK") for designations to authorise the works sought to be authorised by:
 - (a) NoR 1 – the Drury West Arterial, being a new transport corridor with active mode facilities.
 - (b) NoR 2 – the Pukekohe Link, a new state highway including a shared path from Great South Road, Drury in the northeast, connecting State Highway 22 in the west, and the area in the vicinity of Sim Road/Cape Hill Road, Pukekohe in the south.
2. The Submitter is:
 - (a) Not a trade competitor in terms of section 308B of the Resource Management Act 1991; and
 - (b) Is potentially adversely affected by the works sought to be authorised by the NOR.
3. MFT does not oppose the proposed works in principle; it simply seeks to ensure that the conditions imposed on the resulting designations are adequate to protect MFT's interests from both a residential amenity and commercial perspective.
4. To that extent, this submission relates to any parts of the NORs that have the potential to have temporary (construction) or permanent adverse effects on MFT's property at 826 Runciman Road ("Property"). In that regard, we note that:

- (a) The key trustee, Ms Rae McKean, resides at that address and wishes to be confident that the works proposed will not affect her residential amenity or enjoyment of life.
 - (b) Ms McKean is the managing director of Read Pacific Limited, which company distributes educational literature throughout the South Pacific. That business is based at the Property, which has facilities that require efficient access by commercial vehicles - it would create significant difficulties for the RPL business if undue disruption / delays on the local transport network were to arise.
5. The potential adverse effects that the Submitter wishes to ensure are adequately addressed relate to:
- (a) Noise and vibration effects during construction;
 - (b) Long-term / operational noise effects;
 - (c) Transport effects during construction; and
 - (d) Landscape and visual effects during construction and after development.
6. MFT has assessed potential adverse effects by reference to the technical assessment supporting the AEEs for the eight NORS:
- (a) Assessment of Construction Noise and Vibration Effects undertaken by Marshall Day Acoustics and AECOM dated September 2023;
 - (b) Assessment of Operational Noise Effects undertaken by Marshall Day Acoustics and AECOM dated September 2023;
 - (c) Assessment of Landscape and Visual Effects undertaken by Isthmus Group Ltd dated 13 September 2023; and
 - (d) Assessment of Transport Effects undertaken by Beca and AECOM dated September 2023.

MFT requests the following recommendations from Auckland Council

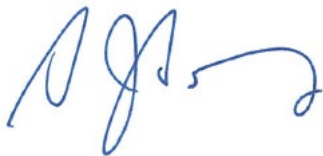
7. If the analysis in those reports is accurate and dependable, it is accepted that effects on the Submitter will be acceptable. The Submitter nevertheless requests that the conditions of consent ensure, as a minimum, the following:
- (a) Noise effects during construction will not exceed 70 dB LAeq;
 - (b) Vibration effects during construction do not exceed the limit of 5 mm/s PPV (Peak Particle Velocity);
 - (c) The long-term operational noise effects will be adequately mitigated where required to ensure the Property does not exceed a dB LAeq(24h) of 47, in accordance with the Operational Noise Assessment; and
 - (d) The landscape and visual effects at the time of the construction and operation, is not inconsistent with the Future Urban Zone and the appropriate mitigation measures will be implemented.
8. It is also requested that when the Construction Traffic Management Plan ("CTMP") is prepared prior to construction and that MFT is notified when this

has been prepared to ensure the transport effects do not adversely affect the Property.

9. The Submitter is hoping that constructive conversations may be held with Auckland Council and AT to ensure the above is achieved.
10. The Submitter:
 - (a) Wishes to be heard in support of this submission (if necessary); and
 - (b) Does not wish to present a joint case with any other submitter given the discrete nature of the issues arising.

Dated 13 November 2023

MCKEAN FAMILY TRUST, by its solicitors
and duly authorised agents, Berry Simons



S J Berry

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www.watercare.co.nz

Submission on Eight Notices of Requirement for the Pukekohe Package lodged by Waka Kotahi NZ Transport Agency and Auckland Transport as requiring authorities under the Resource Management Act 1991

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

SUBMISSION ON: Notices of Requirement ("**NoRs**") for the Pukekohe Package and Local Arterials

FROM: Watercare Services Limited ("**Watercare**")

ADDRESS FOR SERVICE: Mark Bishop
Regulatory & Policy Manager
Watercare Services Ltd
Private Bag 92 521
Wellesley Street
AUCKLAND 1141
Phone: 022 010 6301
Email: Mark.Bishop@water.co.nz

DATE: 13 November 2023

1. INTRODUCTION

- 1.1 Watercare is pleased to have the opportunity to make a submission on the eight NoRs for the Pukekohe and Local Networks lodged by Waka Kotahi NZ Transport Agency ("**Waka Kotahi**") and Auckland Transport as requiring authorities under the Resource Management Act 1991 ("**RMA**") in Auckland.
- 1.2 Watercare neither supports nor opposes the NoRs (ie it is neutral as to whether the NoRs are confirmed or not). Watercare seeks to ensure that any decisions made to confirm the NoRs responds to the issues raised in this submission and avoids, remedies or mitigates potential adverse effects on Watercare's ability to provide water and wastewater services now and in the future. Watercare is interested in all of the eight NoRs.
- 1.3 Watercare could not gain an advantage in trade competition through this submission.

2. WATERCARE – OUR PURPOSE AND MISSION

- 2.1 Watercare is New Zealand's largest provider of water and wastewater services. We are a substantive council-controlled organisation under the Local Government Act 2002 ("**LGA**") and are wholly owned by Auckland Council ("**Council**"). Watercare has a significant role in helping Auckland Council achieve its vision for the city. Our services are vital for life, keep people safe and help communities to flourish.
- 2.2 Watercare provides integrated water and wastewater services to approximately 1.7 million people in the Auckland region. Over the next 30 years, this could increase by another 720,000 people, potentially requiring another 313,000 dwellings along with associated water and wastewater infrastructure. The rate and speed of Auckland's population growth puts pressure on our communities, our environment, and our housing and infrastructure networks. It also means increasing demand for space, infrastructure, and services necessary to support this level of growth.
- 2.3 Under both the LGA and the Local Government (Auckland Council) Act 2009, Watercare has certain obligations. For example, Watercare must achieve its shareholder's objectives as specified in our statement of intent, be a good employer, and exhibit a sense of social and environmental responsibility.¹
- 2.4 Watercare must also give effect to relevant aspects of the Council's Long-Term Plan, and act consistently with other plans and strategies of the Council, including the Auckland Unitary Plan (Operative in Part) and the Auckland Future Development Strategy.
- 2.5 Watercare is also required to manage our operations efficiently with a view to keeping overall costs of water supply and wastewater services to our customers (collectively) at minimum levels, consistent with effective conduct of the undertakings and maintenance of long-term integrity of our assets.²

3. PLANNED AND EXISTING WATERCARE ASSETS

- 3.1 Some of the NoRs interact with existing Watercare water and wastewater assets. The Assessment of Effects on the Environment for the NoRs states that Watercare assets are within the project areas for NoR 1,2 and 5-8.³
- 3.2 Some of the project areas for the NoRs are within areas where Watercare has planned for future infrastructure development. Water and wastewater infrastructure to be developed within the areas covered by the NoRs broadly falls in two categories; developer-led infrastructure to service growth at a local network level, and Watercare-led infrastructure to service growth at a bulk level.
- 3.3 Watercare may have some awareness of developer-led infrastructure projects within the covered areas, but it is important to clarify that Watercare is not responsible for and does not have direct control over these projects until they are finished and officially vested. It is also worth noting that Watercare has limited insight into the details of developer-led infrastructure projects, however as previously noted, wishes to remain involved in future engagement to ensure alignment between infrastructure providers.

¹ LGA, s 59.

² Local Government (Auckland Council) Act 2009, s 57.

³ Assessment of Effects on the Environment for the NoRs (dated September 2023) at Table 11-7.

3.4 Specific commentary regarding known projects within Watercare's Asset Management Plan to service growth at a bulk level is outlined below. Solutions and alignments/locations are subject to change as we learn more, progress our projects and the area develops. There is also potential for new needs to surface, necessitating further bulk infrastructure. Ongoing engagement is critical to maintain alignment.

(a) **NoR Pukekohe: Drury West Arterial⁴ ("NoR 1") (Auckland Transport)**

- The current concept for Watercare's Wesley/Paerata Watermain has it travelling west along Karaka Rd from Runciman Rd. The alignment is yet to be finalised but there is a high likelihood it will intersect with NoR 1.

(b) **NoR Pukekohe: Drury – Pukekohe Link⁵ ("NoR 2") (Waka Kotahi)**

- The current concept for Watercare's Wesley/Paerata Watermain has it travelling west along Karaka Rd from Runciman Rd. The alignment is yet to be finalised but there is a high likelihood it will intersect with NoR 2.
- Watercare plans to install a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd however this is yet to be finalised so there is potential for it to intersect with NoR 2.

(c) **NoR Pukekohe: Paerata Connections⁶ ("NoR 3") (Auckland Transport)**

- Watercare plans to install a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd and while it is yet to be finalised, there is high likelihood it will intersect with NoR 3.

(d) **NoR Pukekohe: Pukekohe North-East Arterial⁷ ("NoR 4") (Auckland Transport)**

- Watercare plans to install a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd and while it is yet to be finalised, there is high likelihood it will intersect with NoR 4.

(e) **NoR Pukekohe: Pukekohe South-East Arterial⁸ ("NoR 5") (Auckland Transport)**

⁴ A new transport corridor with active mode facilities in Drury West, extending south from the intersection of State Highway 22 and Jesmond Road to the edge of the Future Urban Zone near Runciman Road, Drury

⁵ A new state highway including a shared path from Great South Road, Drury in the northeast, connecting State Highway 22 in the west, and the area in the vicinity of Sim Road/Cape Hill Road, Pukekohe in the south.

⁶ Two new transport corridors including active mode facilities. One between the two extents of Sim Road, Paerata across the North Island Main Trunk Rail Line. The second between Paerata Rail Station and Sim Road, Paerata.

⁷ A new transport corridor including active mode facilities between State Highway 22, Paerata on the north west and Pukekohe East Road, Pukekohe in the south east.

⁸ Upgrade part of Pukekohe East Road and Golding Road, and a new connection from Golding Road to Svendsen Road, Pukekohe across Station Road and the North Island Main Trunk Rail Line - including active mode facilities.

- Watercare is working through detailed design of a new Bulk Supply Point (Pukekohe East BSP) at 88 Pukekohe Rd, which is within NoR 5.
 - Watercare plans to install a new wastewater rising main, which would run south down Station Rd before heading west under the NIMT and along Svendsen Rd. Parts of this will fall within NoR 5.
- (f) **NoR Pukekohe: Pukekohe South-West Upgrade⁹ ("NoR 6") (Auckland Transport)**
- The current concept for Watercare's Waikato 2 Watermain has it travelling north up Queen St before heading west and northwest along Harris St and Helvetia Rd. Work is planned to commence shortly to identify the preferred route and work through a NoR process for the watermain. There is a likelihood it will fall within NoR 6.
- (g) **NoR Pukekohe: Pukekohe North-West Upgrade¹⁰ ("NoR 7") (Auckland Transport)**
- Watercare is installing a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd however this is yet to be finalised so there is potential for it to intersect with NoR 7.
 - The current concept for Watercare's Waikato 2 Watermain has it travelling north up Queen St before heading west and northwest along Harris St and Helvetia Rd. Work is planned to commence shortly to identify the preferred route and work through a NoR process for the watermain. There is a likelihood it will fall within NoR 7.
- (h) **NoR Pukekohe: Mill Road and Pukekohe East Road Upgrade¹¹ (NoR 8) (Waka Kotahi)**
- Watercare has no planned projects at this time that intersect with NoR 8, although may have future developments where requirements change due to growth.

4. SUBMISSION POINTS AND RELIEF SOUGHT

- 4.1 This is a submission on the eight NoRs (summarised above) that were lodged on 2 October 2023 and publicly notified on 13 October 2023.
- 4.2 As noted previously, Watercare neither supports or opposes these NoRs (ie it is neutral as to whether the NoRs are confirmed or not). Watercare seeks to ensure that any decisions made on the NoRs responds to the issues raised in this submission and avoids, remedies,

⁹ Upgrade specific intersections and regrade specific driveways on Nelson Street, Ward Street, West Street and Helvetia Road for active mode facilities.

¹⁰ Upgrade Helvetia Road, Pukekohe in the south-west and a new corridor from Helvetia Road to SH22 Paerata in the north-east including active mode facilities.

¹¹ Upgrade of Mill Road (Bombay) in the east for additional vehicle lanes and a shared path and an upgrade of Pukekohe East Road, Pukekohe in the west for a shared path.

or mitigates potential adverse effects on Watercare's ability to provide water and wastewater services now and in the future.

Early engagement

- 4.3 Watercare seeks to ensure that there is a live and continual process planned forward to recognise that asset management and construction plans are constantly updating and changing.
- 4.4 Watercare acknowledges the proactive approach to engagement shown by the requiring authorities to date. Watercare has been in discussions with the Supporting Growth Alliance, and has had discussions through the preceding 'future urban land use strategy' project work. Watercare has also had independent engagement with Waka Kotahi and Auckland Transport during the development of these NoR's.
- 4.5 Watercare supports in depth collaboration and consultation (including information, data sharing and identification of opportunistic works) across infrastructure providers on the development (or redevelopment) of urban environments and wishes to ensure that there is ongoing and timely engagement and collaboration as the projects develop.
- 4.6 As noted, Watercare seeks early engagement from the requiring authorities for future planning and construction works including engagement prior to detailed design and during implementation of construction works. Early and fulsome engagement with Watercare, along with other infrastructure providers, can enable opportunities to plan and future proof the delivery of assets to provide for well-functioning urban environments. For Watercare, this includes applying for, in a timely manner, "Works Over" Approvals, in compliance with Watercare's "Water Supply and Wastewater Network Bylaw 2015" (updated 2021).
- 4.7 In addition, the NoRs interact with existing water and wastewater services. Watercare seeks to ensure the NoRs do not impact its wastewater and water services in the NoR project areas now and into the future (these assets, and planned projects are detailed in paragraph [3.4] above). Watercare wishes to ensure it maintains access to its assets 24 hours a day, 7 days a week for maintenance, safety and efficient operation of its services and that it is consulted on any works undertaken by the requiring authorities that may impact Watercare's services.

Specific amendments to conditions

- 4.8 Watercare has filed evidence, and attended, recent NoR hearings for other Supporting Growth Alliance projects (the North West Strategic Network, and the Airport to Botany Bus Rapid Transit Project). The conditions proposed for the NoRs by the requiring authorities for these NoRs are similar to those which have been proposed at the recent North West Strategic Network hearing (in rebuttal evidence).
- 4.9 Watercare supports the intention of conditions proposed by the requiring authorities which seek to ensure that there is engagement with relevant stakeholders during the development of the eight NoRs (ie the conditions which require a Network Utility Management Plan ("**NUMP**"), Stakeholders Communication and Engagement Management Plan ("**SECEMP**"), and Land use Integration Process ("**LIP**").
- 4.10 That said, Watercare considers further amendments to the conditions are required to address matters raised in this submission, so that the conditions for the eight NoRs

adequately provide for engagement with network utilities, in particular during the feasibility and detailed design stage.

- 4.11 Watercare seeks that a new condition requiring the preparation of a "Network Utility Strategic Outcomes Plan" be added to all eight NoRs to futureproof assets in consultation with network utility operators such as Watercare:

Network Utility Strategic Outcomes Plan (NUSOP)

- (a) A NUSOP shall be prepared in the project feasibility stage or as early as practicable.
- (b) The objective of the NUSOP is to set out a strategic framework for asset resilience that includes consideration of growth, corridor protection, and asset renewals over time.
- (c) The NUSOP shall:
 - i. consider expected asset life of existing assets;
 - ii. consider expected asset capacity increases or changes; and
 - iii. demonstrate how city and national strategic plans are considered.
- (d) The NUSOP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project, including Watercare.
- (e) The NUSOP shall describe how strategic plans from the Network Utility Operators in relation to its assets have been addressed.
- (f) Any comments received from the Network Utility Operator shall be considered when finalising the NUSOP.
- (g) Any amendments to the NUSOP related to the assets of a Network Utility Operator shall be prepared in consultation with that asset owner.

- 4.12 If the above condition is not included in the NoRs, Watercare seeks the following amendments (shown in underline) to the NUSOP condition for all eight of the NoRs:

- (a) A NUSOP shall be prepared after consultation with Network Utility Operator(s) including during the feasibility and detailed design phases, and prior to the lodgement of an Outline Plan of Works for a stage of construction Start-of-Construction for a Stage of Work.
- ...
- (c) The NUSOP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project and shall include any s177 consents required for works affecting prior Designations and Watercare "Works Over Approvals".
- ...
- (h) The Requiring Authority shall consult with Network Utility Operators during the feasibility and detailed design phases to identify opportunities to enable, or not preclude, the development of new network utility facilities including access to power, water services and ducting within the Project, where practicable to do so. The consultation undertaken, opportunities considered, and whether or not they

have been incorporated into the detailed design, shall be summarised in the Outline Plan or Plans prepared for the Project.

- 4.13 Watercare also seeks that the LIP condition is included in all of the NoRs (including the NoRs lodged by Waka Kotahi), as opposed to only being included in the Auckland Transport NoRs as is currently proposed.

5. RECOMMENDATION SOUGHT

- 5.1 Watercare seeks that Auckland Council recommends:

- (a) amendments to the conditions of the NoRs, as set out above in its submission (and any other conditions), to ensure any adverse effects on Watercare's assets and operations are avoided, remedied or mitigated and to address the concerns set out above; and
- (b) such further other relief or other consequential amendments as considered appropriate and necessary to address the concerns set out above.

- 5.2 Watercare wishes to be heard in support of this submission.

- 5.3 If others make a similar submission, consideration would be given to presenting a joint case with them at any hearing.



Steve Webster
Chief Infrastructure Officer
Watercare Services Limited

Form 21

Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification under Section 168A, 169, 181, 189A, 190 and 195A of the Resource Management Act 1991

Date: 13 November 2023

To: Te Tupu Ngātahi – Supporting Growth Alliance

Name of Submitter: Te Tāhuhu o te Mātauranga | Ministry of Education

Address for Service: Woods
8 Nugent Street
Grafton, Auckland

Attention: Emma Howie, General Manager – Planning & Urban Design

Phone: 027 572 2220

Email: emma.howie@woods.co.nz

Submission on eight Notices of Requirement for Te Tupu Ngātahi Supporting Growth for the Pukekohe Transport Network

SUMMARY

- 1) The Ministry of Education (“**the Ministry**”) is the Government’s lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government’s goals for education.
- 2) Te Tupu Ngātahi Supporting Growth Alliance (“**Te Tupu Ngātahi**”) has lodged eight Notices of Requirement (“**NoR**”) for the Pukekohe within the Pukekohe, Paerata and Drury West areas:
 - NoR 1 – Pukekohe: Drury West Arterial
 - NoR 2 – Pukekohe: Drury – Pukekohe Link
 - NoR 3 – Pukekohe: Paerata Connections
 - NoR 4 - Pukekohe: Pukekohe North-East Arterial
 - NoR 5 - Pukekohe: Pukekohe South-East Arterial
 - NoR 6 - Pukekohe: Pukekohe South-West Upgrade
 - NoR 7 - Pukekohe: Pukekohe North-West Upgrade
 - NoR 8 - Pukekohe: Mill Road and Pukekohe East Road Upgrade
- 3) This submission relates to all eight NoRs lodged by Te Tupu Ngātahi.
- 4) There are a number of existing schools in proximity to the NoRs. There is potential for these schools, or any future schools developed in this area, to be affected by traffic, noise and other nuisance effects arising from future construction works of this transportation network. The Ministry is seeking to ensure that appropriate conditions are included in the designations to mitigate any adverse effects associated with the construction of the Pukekohe transport network.

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- 5) The Ministry supports the provision of active transport modes (walking and cycling) as proposed through the Pukekohe Transport Network.
 - 6) Overall, the Ministry's submission is neutral on the NoRs subject to the following request for changes being made to the conditions including:
 - Updating acronym/terms and conditions within the Designations to be consistent with other conditions Te Tupu Ngātahi have agreed to on other NoRs through the Supporting Growth Programme;
 - Amendments to the Stakeholder Communication and Engagement Management Plan ("**SCEMP**") to include reference to schools within proximity to the Pukekohe Transport Network; and
 - Amendments to the Construction Traffic Management Plan ("**CTMP**"), to avoid using any roads around schools during the AM and PM peak periods.
 - 7) The Ministry wishes to be heard in support of its submission.

OVERVIEW OF THE MINISTRY'S RESPONSIBILITIES & LAND INTERESTS

- 8) The Ministry is the Government's lead advisor on the New Zealand education system. The Education and Training Act 2020 sets out the obligations and responsibilities of the Ministry. The Ministry have responsibility for the education outcomes of students across the full spectrum of the education sector, including pre-school, primary and secondary levels.
- 9) The Ministry assesses population changes, school roll fluctuations and other trends and challenges impacting on education provision at all levels of the education network to identify changing needs within the network so the Ministry can respond effectively.
- 10) The Minister of Education is a Requiring Authority under the Resource Management Act 1991 ("**RMA**") and has over 400 education purposes designations in the Auckland Unitary Plan: Operative in Part ("**AUP:OP**").
- 11) The Ministry has responsibility for all education property owned by the Crown. This involves managing the existing property portfolio, upgrading and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing.
- 12) The Ministry is therefore a considerable stakeholder and social infrastructure provider in terms of activities that may impact existing and future educational facilities and assets in the Auckland region.
- 13) The Ministry has multiple education sites within the Pukekohe, Paerata and Drury West area including Karaka School, Wesley Primary School, Wesley College, Paerata School, Pukekohe East School, Pukekohe North School, Tamaoho School, Pukekohe Intermediate School, Pukekohe High School, Valley School, and Pukekohe Hill School.
- 14) The location of each NoR in relation to the Ministry's existing assets is shown in Figure 1.

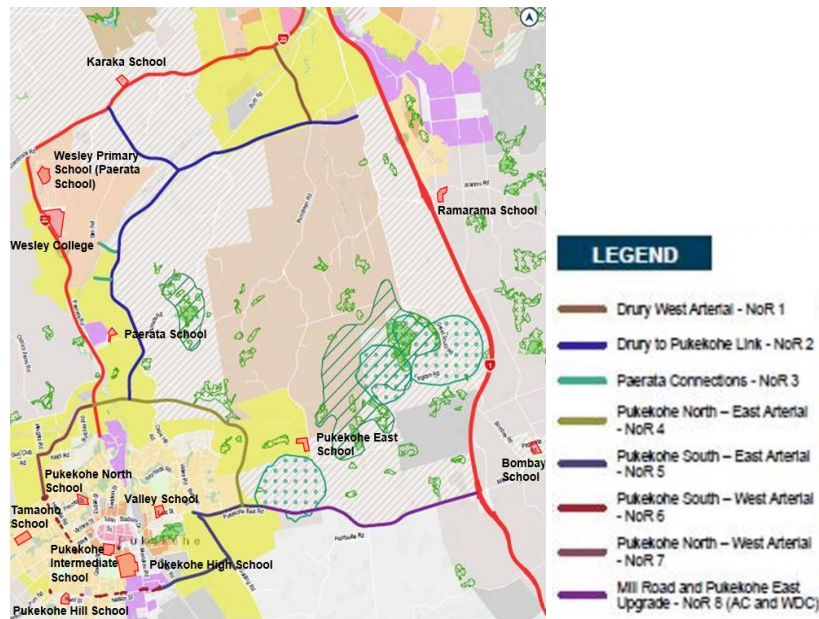


Figure 1: Project Overview – Location of Eight NoRs (identified in the legend) in relation to the Ministry of Education’s School Network (outlined in red)

MINISTRY OF EDUCATION’S SUBMISSION

- 15) Under the RMA, decision makers must have regard to the health and safety of people and communities. Furthermore, there is a duty to avoid, remedy or mitigate actual and potential adverse effects on the environment.
- 16) The eight NoRs to designate land for future strategic transport corridors in Pukekohe, Paerata, and Drury West areas, enable the future construction, operation, maintenance of transport infrastructure to support anticipated growth within Auckland’s future urban zoned area over the next 10 – 30 years. The project supports improved walking and cycling, public transport, and general traffic connections. The key reasons for this investment are to improve safety, better integrate transport and land use, improving accessibility, transport resilience, and promoting travel choice.
- 17) The Ministry broadly supports the Project aim to plan transport investment in Auckland’s future urban zoned areas. The project will improve active mode facilities, enhancing the safety of students walking and cycling to and from school.
- 18) The Ministry supports the provision of shared pathways, bi-directional cycle ways, upgrading of intersections, that will provide safe access to the current and future wider school network. Encouraging mode shift will provide significant health benefits for students and staff, reducing traffic generation at pick up and drop off times. Schools should be well serviced by safe and accessible pedestrian and cycling links as well as public transportation facilities, and it is considered that the proposed upgrades will provide adequate cycling and walking infrastructure to the surrounding area.
- 19) The Pukekohe project is a large programme of works. The quantum of construction required to deliver the projects will likely have temporary adverse effects on the surrounding environment. There are several schools in proximity to the NoRs. There is potential for these schools to be affected by traffic, noise and other nuisance effects arising from future construction works. The construction timing and staffing is yet to be determined, so there is uncertainty regarding the construction methodology, including the routes for construction vehicles and the location of construction laydown areas.

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- 20) The Ministry seeks to appropriately address and manage construction related effects and the ongoing potential effects the project may have on the operation and management of the schools for NoRs 2, 4, 5, 6, 7 and 8. Additionally, as the project is planned for works over the next 10 to 30 years, the Ministry is also submitting on NoRs 1 and 3 in the event any new schools are developed in the project area.
- 21) The key issues that the Ministry has concerns about in relation to the NoRs include construction traffic effects and stakeholder engagement which are outlined below. Consequential changes are also sought to the acronyms/terms and conditions of the NoRs for consistency with other Te Tupu Ngātahi designations. The requested changes are included in **Appendix 1** to this submission.

Construction traffic effects

- 22) The surrounding schools (and any future schools) will potentially be affected by an increased volume of heavy vehicles to access the construction area of the NoRs. This is a traffic safety concern for students walking and cycling to school at peak pick up and drop off times.
- 23) Condition [17] requires the preparation of a CTMP prior to the start of construction. The Ministry supports the inclusion of this condition but requests that specific reference is made to education facilities to address the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours (for example on roads servicing educational facilities during pick up and drop off times) to manage vehicular and pedestrian traffic near educational facilities or to manage traffic congestion.
- 24) Amendments made to conditions are requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing¹ and to conditions agreed through the Te Tupu Ngātahi Airport to Botany Bus Rapid Transit Project NoRs².

Stakeholder engagement

- 25) The Ministry supports the establishment of SCEMP as proposed condition [8]. The Ministry considers that they are a key stakeholder in this Project, and specific engagement is required to manage construction effects on the schools. Amendments made to conditions are requested to identify schools within proximity to the project and to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.

RELIEF SOUGHT

- 26) In principle, based on the above, the Ministry supports the proposed walking and cycling facilities proposed in each NoR application providing improved active mode connectivity is essential to provide existing and future communities with a sustainable means of accessing education facilities in Pukekohe, Paerata, and Drury West.
- 27) To ensure effects associated with the NoRs on the Ministry are appropriately managed, it is requested that appropriate conditions are imposed on the designations in accordance with the RMA. It is requested that amendments to conditions as set out in **Appendix 1** are adopted by Te Tupu Ngātahi. The amendments sought include:
- a) Amendment to the acronym/terms to be consistent with other Te Tupu Ngātahi designations to include a definition of 'educational facilities' and 'stakeholders';
 - b) Inclusion of the Ministry and schools in the SCEMP; and
 - c) Inclusion of the Ministry and schools as stakeholder in the CTMP.

¹ In the Matter of Notices of Requirement for designations by Auckland Transport collectively known as the Warkworth Package - Chris Scafton Statement of Rebuttal Evidence on behalf of Auckland Transport – Strategic Planning and Conditions dated 26 October 2023.

² In the Matter of Notices of Requirement for designations by Auckland Transport collectively known as the Airport to Botany Bus Rapid Transit Project – Requiring Authority Primary Evidence Appendix B -ref: EV148B RA.

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- 28) Overall, the submission is neutral subject to the above changes being made to the designation conditions.
 - 29) Such other consequential amendments to the NoRs may be necessary to give effect to the relief sought through this submission.
 - 30) The Ministry wishes to be heard in support of its feedback.

APPENDIX 1: AMENDMENTS SOUGHT TO CONDITIONS

Amendments are sought to the proposed abbreviations and definitions along with conditions to be included in all of the NoRs (NoR 1 – 8). Changes to these provisions sought by the Ministry are noted below.

PROPOSED ABBREVIATIONS AND DEFINITIONS

Acronym/terms for all Te Tupu Ngātahi Pukekohe Transport Network designations changes sought to conditions identified as - <u>Underlined</u> and strikethrough		
Acronym/Term	Definition	Submission Comment
<u>Educational Facilities</u>	<p>Facility used for education to secondary level.</p> <p><u>Includes:</u></p> <ul style="list-style-type: none"> ▪ <u>Schools and outdoor education facilities; and</u> ▪ <u>Accommodation, administrative, cultural, religious, health, retail, and communal facilities accessory to the above.</u> <p><u>Excludes:</u></p> <ul style="list-style-type: none"> ▪ <u>Care centres; and</u> ▪ <u>Tertiary education facilities</u> 	<p>Inclusion requested</p> <p>The requested term and definition are consistent with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing³.</p>
<u>Stakeholders</u>	<p><u>Stakeholders to be identified in accordance with Condition [x], which may include as appropriate:</u></p> <ol style="list-style-type: none"> a) <u>Adjacent owners and occupiers;</u> b) <u>Adjacent business owners and occupiers;</u> c) <u>Central and local government bodies;</u> d) <u>Community groups;</u> e) <u>Developers;</u> f) <u>Development agencies;</u> g) <u>Educational facilities; and</u> h) <u>Network utility operators.</u> 	<p>Inclusion requested</p> <p>The requested term and definition are consistent with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p>

³ In the Matter of Notices of requirement for designations by Auckland Transport collectively known as the Warkworth Package - Chris Scrafton Statement of Rebuttal Evidence on behalf of Auckland Transport – Strategic Planning and Conditions dated 26 October 2023.

PROPOSED CONDITIONS

Proposed conditions as per other Te Tupu Ngātahi designations		
<u>Underlined and strikethrough</u> – changes proposed for all NoRs		
No.	Condition	Submission Comment
General Conditions		
[x]	<p>Stakeholder Communication and Engagement</p> <p>(a) <u>At least 6 months prior to the start of detailed design for a Stage of Work, the Requiring Authority shall identify:</u></p> <p>(i) <u>A list of Stakeholders;</u></p> <p>(ii) <u>A list of properties within the designation which the Requiring Authority does not own or have occupation rights to; and</u></p> <p>(iii) <u>Methods to engage with Stakeholders and the owners and occupiers of properties identified in (a)(i) – (ii) above.</u></p> <p>(b) <u>A record of (a) shall be submitted within an Outline Plan for relevant Stage of Work.</u></p>	<p>Inclusion requested</p> <p>The condition is requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p>
Pre-construction Conditions		
8	<p>Stakeholder Communication and Engagement Management Plan (SCEMP)</p> <p>(a) A SCEMP shall be prepared in consultation with Stakeholders, community groups and organisations prior to the Start of Construction any Outline Plan being submitted.</p> <p>(b) The objective of the SCEMP is to identify how the public Stakeholders (including directly affected and adjacent owners and occupiers of land) will be engaged with prior to and throughout the Construction Works. To achieve the objective of the SCEMP shall include:</p> <p>(i) <u>a list of stakeholders;</u></p> <p>(ii) <u>a list of properties within the designation which the Requiring Authority does not own or have occupation rights to;</u></p> <p>(iii) <u>methods to engage with Stakeholders and the owners of properties identified in (b)(ii) above;</u></p> <p>(i) At least 18 months prior to any Outline Plan being submitted, the Requiring Authority shall identify:</p> <p>A. The properties whose owners will be engaged with;</p> <p>B. A list of key stakeholders, community groups, organisations and business who will be engaged with;</p> <p>C. Methods and timing to engage with landowners and occupiers whose access is directly affected</p> <p>(ii) The SCEMP shall include:</p> <p>A. Detailed of (b)(i)A to C;</p> <p>(iv) The contact details for the Project Liaison Person. These details shall be on the Project website, or equivalent virtual information source, and prominently displayed at the main entrance(s) to the site(s);</p>	<p>Amendment requested</p> <p>Amendments are requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p> <p>A list of schools to be engaged with has also been included in the condition as they are located in proximity to the Pukekohe Project and may be subject to construction traffic effects associated with the works.</p>

	<p>(v) The procedures for ensuring that there is a contact person available for the duration of Construction Works, for public enquiries or complaints about the Construction Works;</p> <p>(vi) Methods for engaging with Mana Whenua, to be developed in consultation with Mana Whenua;</p> <p>(vii) <u>Methods and timing to engage with landowners and occupiers whose access is directly affected;</u></p> <p>(viii) <u>Methods for engaging with the Ministry of Education (MoE), surrounding schools (including Karaka School, Wesley Primary School, Wesley College, Paerata School, Pukekohe East School, Pukekohe North School, Tamaoho School, Pukekohe Intermediate School, Pukekohe High School, Valley School, and Pukekohe Hill School), and any future schools. The MoE and Schools must be contacted ten days prior to the start of any construction within 500 metres of the school boundary. Contact details of the construction manager must be shared with the Ministry of Education, Schools, and future schools (should the school have any safety concerns during construction).</u></p> <p>(ix) Methods to communicate key project milestones and the proposed hours of construction activities including outside of normal working hours and on weekends and public holidays, to the parties identified in (b)(i) and (ii) above; and</p> <p>(x) Linkages and cross references to communication and engagement methods set out in other conditions and management plans where relevant.</p> <p>(c) Any SCEMP prepared for a Stage of Work shall be submitted to Council for information ten working days prior to the Start of Construction for a Stage of Work.</p>	
Construction Conditions		
17	<p>Construction Traffic Management Plan (CTMP)</p> <p>(a) A CTMP shall be prepared prior to the Start of Construction for a Stage of Work. The objective of the CTMP is to avoid, remedy or mitigate, as far as practicable, adverse construction traffic effects.</p> <p>To achieve this objective, the CTMP shall include:</p> <p>(i) methods to manage the effects of temporary traffic management activities on traffic;</p> <p>(ii) measures to ensure the safety of all transport users;</p> <p>(iii) the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours (<u>for example on roads servicing educational facilities during pick up and drop off times</u>) to manage vehicular and pedestrian traffic near <u>educational facilities</u> schools or to manage traffic congestion;</p> <p>(iv) site access routes and access points for heavy vehicles, the size and location of parking areas for plant, construction vehicles and the vehicles of workers and visitors;</p>	<p>Amendment requested</p> <p>Amendments are requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p> <p>Additionally, wording has also been amended to reflect changes made to the Te Tupu Ngātahi Airport to Botany Bus Rapid Transport conditions as included in the Primary Evidence prior to the Council hearing⁴.</p>

⁴ In the Matter of Notices of Requirement for designations by Auckland Transport collectively known as the Airport to Botany Bus Rapid Transit Project – Requiring Authority Primary Evidence Appendix B -ref: EV148B RA.

	<ul style="list-style-type: none"> (v) identification of detour routes and other methods to ensure the safe management and maintenance of traffic flows, <u>including public transport service, including pedestrians and cyclists, on existing roads;</u> (vi) methods to maintain vehicle access to <u>and within</u> property and/or private roads <u>for all transport modes</u> where practicable, or to provide alternative access arrangements when it will not be; (vii) the management approach to loads on heavy vehicles, including covering loads of fine material, the use of wheel-wash facilities at site exit points and the timely removal of any material deposited or spilled on public roads; (viii) methods that will be undertaken to communicate traffic management measures to affected road users (e.g. residents/public/stakeholders/emergency services); (ix) <u>auditing, monitoring and reporting requirements relating to traffic management activities shall be undertaken in accordance with the New Zealand Guide to Temporary Traffic Management or any subsequent version;</u> (x) <u>details of minimum network performance parameters during the construction phase, including any measures to monitor compliance with the performance parameters; and</u> (xi) <u>details of any measures proposed to be implemented in the event thresholds identified in (x) being exceeded;</u> 	
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Submission on:
Notice of Requirement: NoR 2 Drury to Pukekohe Link (Waka Kotahi) AND
Notice of Requirement: NoR 3 Paerata Connections (Auckland Transport)

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

unitaryplan@aucklandcouncil.govt.nz

Submitter: Paerata 5 Farms Limited ("P5FL")

Address for Service: Attn: Henry Chiang
henry@belmontparkestate.co.nz
28 Allen Johnston Place, Saint Johns, Auckland, 1072 ,
New Zealand

Introduction:

1. This is a submission on:
 - (a) The Notice of Requirement (NoR) lodged by Waka Kotahi (NoR 2) being the Pukekohe Transport Network: Drury to Pukekohe Link.
 - (b) The NoR lodged by Auckland Transport (NoR 3) being the Paerata Connections.
2. As the NoR's are interlinked this submission addresses both NoR's.
3. The submitter could not gain an advantage in trade competition through this submission.
4. Paerata 5 Farms Limited is the owner of 412 Sim Road, which is land on which part of the NoR applies. The land is leased to Karaka Contracting Limited, who uses the land for their dairy farming business.
5. P5FL is also authorised to submit on behalf of the owner of 328 Sim Road, and this submission applies to both titles referred to as the "P5FL land".

Paerata Growth Area Background

6. The Paerata area is a green field Auckland city expansion area, confirmed through the Auckland Unitary Plan ("AUP") process to provide for the expanding population of Auckland. Further technical work was undertaken by Auckland Council in its preparation of the Pukekohe Area Plan, which has now also been superseded by the Pukekohe-Paerata Structure Plan which was adopted by Auckland Council Planning Committee on the 6th August 2019. This document states that land use and transport need to be integrated, and that technical investigation and landowner engagement is required before future transport projects can be confirmed.
7. The Structure Plan meets the AUP Appendix 1 Structure Plan guidelines (which is needed for any re-zoning proposal).
8. This document identifies 328 and 412 Sim Road land as being suitable and "earmarked" for high density residential housing. The National Policy Statement Urban Development suggests that "high density" at this location should be Terraced Housing and Apartment Building zone in relation to how the Auckland Unitary Plan is proposed to address development around the train station.

Masterplanning

9. As 328 and 412 Sim Road is zoned future urban, it does not yet have a final masterplan however, Transurban are in the process of preparing an overarching structure for the site including key movement corridors and open space networks and are working towards a more detailed masterplan to guide rezoning and future development of the site.

KiwiRail Designations

10. In early 2022 KiwiRail confirmed its designations for land associated with the Paerata Rail Station. These are Designations 6310 and 6311 and their overlap with the submitter's landholding is identified in the plan in **Attachment A**. These are in addition to, and overlap designation 6302.
11. As part of the submissions to the KiwiRail NoR's, P5FL identified its significant concerns that the overall design and conditions package had been developed in isolation to the other elements of a successful urban environment and without regard to the imminent urban environment, which could have significant impact on the resulting design and function of the surrounding land.

12. While the KiwiRail conditions and decision making “assured” P5FL that quality outcomes would be achieved, it is the direct experience of P5FL that despite assurances and conditions, very little regard for the imminent urban environment of P5FL's landholding is occurring. These direct experiences create a high degree of concern that similar style conditions and concepts have been presented by Auckland Transport/Waka Kotahi in respect of the future road alignments (NoRs).

Support/Oppose and Reasons for submission:

13. The submitter **opposes** the NoR for the following reasons (which are also indicated on the plan in **Attachment A**):
- (a) The NoR does not connect with the KiwiRail layout / approved designations and appears to rely on KiwiRail amending and/or relinquishing part of their operative designation. Any amendment to the KiwiRail designation should have occurred prior to notification of the NoR. Furthermore, there is a significant disconnect between the KiwiRail concept plan (attached to the designation) in terms of layout and the proposed NoR's. Alignment between KiwiRail and the Supporting Growth (Waka Kotahi and Auckland Transport) projects should have been resolved prior to notification, and we seek this is appropriately addressed.
 - (b) The NoR and the Assessment of Alternatives criteria is flawed as it does not appropriately account for the following matters relating to FUZ land in comparison to rural land:
 - (i) the future land use integration of FUZ land with the land take/design of the road network;
 - (ii) the opportunity cost for future housing targets of acquiring FUZ land compared to rural zoned land (i.e the efficient use of future urban zoned land);
 - (iii) additional costs to FUZ landowners to match or resolve proposed design levels.
 - (c) The NoR and the Assessment of Alternatives insufficiently justifies:
 - (i) The necessity for the two east-west road (three if considering the KiwiRail designation) connections to the west through the submitter's landholding and associated loss of FUZ zoned developable land.

- (ii) An unnecessary duplication of east-west corridors about the Paerata station. Only one east-west arterial connection to/alongside the Paerata station is required (as per the Structure Plan), providing sufficient capacity that achieves the efficient, effective and safe movement of vehicles and people while providing for urban growth at a key location.
- (d) The concept design for the road layout/roundabout and NoR land take area is fundamentally flawed. For example:
- (i) The land take and associated primary concept design appears to only cater for single lane roads but the roundabouts are dual lane.
 - (ii) No provision has been made for public transport stops, integration.
 - (iii) No provision has been made for potential road future connections for development with the P5FL land. Consideration of road connections into the P5FL landholding should be considered as part of the design, noting the topography of the corridor and status of Sim Road as a future Arterial Road would present engineering constraints that should be considered now, along with the impacts to the development potential of the FUZ P5FL land. Suggested locations for these intersections are identified on **Attachment A**.
 - (iv) The northern roundabout (adjacent to the P5FL land) creates a portion of “no mans land” between the P5FL land and the finished design of the roundabout. The roundabout could have been relocated to avoid this and/or the “no mans land” should be transferred to P5FL to be integrated into the overall masterplanning and development of the P5FL landholding.
 - (v) The horizontal and vertical alignment of the roads could be modified to reduce land take in the more valuable FUZ land, and reduce the amount of fill required within the FUZ and rural land. For example the design could be lowered in sections (particularly for Sim Road). This needs consideration with NoR 3 and the issue identified with its proposed levels.
 - (vi) The alignment is an underutilisation of the existing Sim Road/land resource and has not appropriately taken into account the future uses of the existing Sim Road (i.e what will happen to the land).

- (e) There is no appropriate stormwater solution for the arterial road network. The NoR material contains insufficient detail on the proposed stormwater solutions for treatment and attenuation including final location of devices and the overland flow from these devices. The locations of the devices do not have consideration of future roading connections to the P5FL landholding and their elevated position in relation to the lower land to the West of Sim Road will require appropriate geotechnical consideration for slope stability. Future lot owners are at risk of stormwater bunds failing or spillways engaging and flooding occurring – there seems to be no allowance for easements or any other legal mechanism to allow for passage of this water between the devices, through the P5FL land and to the outlet on the downstream side of the site. The NoR also should have sought integration (or combining) with the KiwiRail designation and the associated stormwater solutions for those projects and works to ensure a more efficient use of infrastructure and land.

- (f) There is insufficient geotechnical information to support the design and designation extents and potential stability effects. The additional earth loads proposed by the fill embankments on both sides of Sim Road may require stability works such as shear keys, underfill drainage and walls which extend past the current designation.

- (g) The 20 year lapse date sterilises the development of the P5FL landholding. As identified previously, the land is earmarked to be rezoned and the rezoning should be enabled to aligned to meet the required growth capacity. There was an expectation that this land would have been rezoned by now (through the FULS strategy), but this has been delayed by Council. The NoR is significantly larger than the road boundary in order to enable construction of the roads, and this has the potential to create a disconnect between the timing of development and the implementation of the road network should the growth capacity of the P5FL site be required to come online sooner than the 20 year lapse date, and thus jeopardises the ability to enable subdivision and development designs on the P5FL site which aims to create a successful and high quality integrated urban environment.

- (h) The concept design and NoR boundary/location will not enable a high quality urban environment to develop on the P5FL landholding. For example:
 - (i) The vertical alignment of NoR 3 at the KiwiRail designation (for the train station) results in an inappropriate fill batter which will not enable quality design outcomes including connections or integration with the surrounding land without significant earthworks and fill requirements. An alternative solution may be to have a larger batter (with a flatter gradient) to result in a suitable outcome.
 - (ii) The design contours, and specifically the amount of fill area will essentially force the future development of the P5FL to also fill to tie into and match the levels. The interface of the arterials with the adjoining P5FL land should be reassessed and design levels appropriately integrated.
 - (iii) No provision has been made for potential road future connections for development with the P5FL land. Specifically, the northern portion of the land P5FL land will be boarded on three sides by arterial roads and the railway on the western side, with no alternative for access. Similarly, the remainder of the P5FL land holding requires at least one and ideally two additional access location off Sim Road (on the two horizontal curves outside 393 Sim Road and 447 Sim Road), and provision should be made to connect to the west linkage accessing the train station.
 - (iv) There is no certainty as to the integration in levels and final designs between the KiwiRail designation and the future arterial roads.
 - (v) There is no certainty on what interface is expected between urban development and the arterial roads.

14. The submitter **opposes** the conditions as they do not address concerns of the submitter (outlined above) and in addition for following reasons:

- (a) Given P5FL experience with KiwiRail's designation implementation it has little confidence in reliance on future management plans to achieve a quality built environment or the ability of P5FL to have "meaningful" input into the final design. The concept design should be amended first to respond to the concerns of the submitter.

- (b) The SCEMP does not include any provision for affected landowner input into the management plans or any resolution process for where the concerns of the landowner are not being adequately addressed by the outline plan of works/management plans.
- (c) The ULDMP should be utilised as a tool for refinement and implementation of a design which is already of a standard which will achieve quality urban design and landscape outcomes, as opposed to a tool to fix the current concept plan.
- (d) The ULDMP requires stakeholders to be invited to participate in the detailed design 6 months prior to the start of detailed design. There is no obligation for this participation to continue through the detailed design.
- (e) ULDMP should also include an independent process for any disagreement in the design outcomes (as listed in clause (f) of the ULDMP condition) or achievement of the ULDMP objective outcomes (as listed in clause (b) of the ULDMP condition).
- (f) The project should not enable any increase in flood hazard (even by 50mm) on any sites.
 - (i) This creates an unacceptable hazard for which future developers and landowners will have to bear the costs of future technical work to mitigate the flood risk;
 - (ii) Any new flood risk will devalue land by creating a "hazard" on sites where no such hazard existed.

15. P5FL consider that the NoR:

- (a) Has not adequately considered alternative sites, routes and methods for undertaking the proposed works;
- (b) Does not promote the sustainable management of natural and physical resources and is contrary to Part 2 of the RMA, including that:
 - (i) Potential adverse effects are not appropriately addressed; and
 - (ii) The social, economic and cultural well-being of the community in the Auckland Region is jeopardised through the inefficient use Future Urban Zoned land;

Relief sought:

16. P5FL seeks that the Council recommend that the NoR:

(a) Be declined; **OR**

(b) that NoR is **amended** to respond to the concerns of the submitter

Hearing:

17. The submitter wishes to be heard in support of its submission.

18. If others make a similar submission, the submitter will consider presenting a joint case with them at any hearing.

Henry Chiang (for Paerata 5 Farms Limited)

henry@belmontparkestate.co.nz

Phone: 021 067 2589

Address: 28 Allen Johnston Place, Saint Johns, Auckland, 1072 , New Zealand

13 November 2023

Attachment A:



NOTES:

- 1. DRAWING INCLUDES:
 - 1.1. GIS CONTOURS
 - 1.2. KIWI RAIL DESIGNATIONS AND CURRENT DESIGN OF ACCESS ROADS AND PARKING
 - 1.3. NZTA NOR # 2 AND # 3.

CIVILPLAN CONSULTANTS

Level 9, Laidlaw House, 20 Amersham Way, Manukau, Auckland. Phone: 09 222 2445

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PROJECT TITLE:
**PAERATA 5 FARMS LIMITED
 328 AND 412 SIM ROAD
 PUKEKOHE
 ####**

SHEET TITLE:
**NZTA NOR 2 AND 3 LAYOUT
 OVERLAY WITH COMMENTS**

SCALE: (A1/A3) **1:3000 / 1:6000**
 SCALE BAR: 0 60 120 180 240 300m

ISSUE STATUS: **DRAFT@13.11.2023**

PROJECT NUMBER: **2342-01** DRAWING NUMBER: **SK03-1** REV: **-**

REVISION DETAILS: **228** dd.mm.yyyy
 DRAWN: - CHECKED: -

13 November 2023

By email to: unitaryplan@aucklandcouncil.govt.nz

Submission on Pukekohe Notices of Requirement 1-8

1 Introduction

- 1.1 Counties Energy thanks you for the opportunity to provide a submission concerning the Pukekohe Notices of Requirement 1 to 8. This submission applies to all Notices of requirement. Specific comments concerning individual NoRs are made in addition to the general comment where required.

2 About Counties Energy

- 2.1 Counties Energy Limited (CEL) is an electricity operator under the Electricity Act, a network operator under the Telecommunications Act, and a network utility operator under the Resource Management Act. CEL is a requiring authority in respect of its electricity network. The Civil Defence and Emergency Management Act also cites electricity distribution as a lifeline utility.
- 2.2 CEL owns, manages and operates an electricity distribution network supplying nearly 45,000 homes, farms and businesses in the southern Auckland, northern Waikato and Hauraki District areas. Electricity is an essential infrastructure that enables development to occur. Much of the network supplying CEL's customers is overhead in the rural areas, with a mix of overhead and underground assets in the urban areas, particularly in the eastern part of the network which has and continues to experience high levels of growth.
- 2.3 CEL receives power from the national grid at Bombay and Glenbrook Grid Exit points, from where it is conveyed at either 110kV or 33kV (high voltage) to nine substations before being converted to either 22kV or 11kV (medium voltage) to be distributed via overhead lines, underground cables, transformers and associated equipment so it can be used by the customer, whether at 400V (low voltage) or at medium voltages for larger businesses.
- 2.4 Future proofing and protection of existing assets is key to meeting the needs of the communities and businesses CEL serves in light of pressures from urban growth. CEL sees NoRs 1-8 as providing



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Postal
Private Bag 4
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New Zealand

Energy
Reimagined

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potential network utility corridors and therefore opportunities for extension of its distribution network between substations and to accommodate the future demands of urban expansion in and around the Drury and Pukekohe area.

3 Submission Points

3.1 CEL is generally supportive of the alignment of the new roads indicated by the Proposed Designation Boundaries indicated on drawings SGA-DRG-STH-002-1000, 2000, 2100, 2200, 2300, 2400, 3000, 4000, 4100, 5000, 5100, 6000, 6100, 7000, 8000 and 8100.

3.2 The proposed NoR alignments offer opportunity for extension of the distribution network.

3.3 However, we note the following omissions across all the afore mentioned drawings:

Existing overhead infrastructure in existing road corridors and proposed designations

Medium voltage (11kV and 22kV) lines and low voltage lines

Fibre cable

Pole locations in urban areas where footpaths and cycleway upgrades occupy the back berm

Existing underground infrastructure in existing road corridors and proposed designations

Fibre

Low voltage cables

Equipment associated with underground electricity reticulation located in the berm e.g., pad mounted transformers, switchgear, link boxes and network pillars

3.4 CEL will require further consultation and detailed planning concerning parts of NoRs 1-8 which may impact the location and safe operation of the assets listed under paragraph 3.3.

3.5 CEL will also require further consultation and detailed planning where it is proposed to cut or fill in the vicinity of existing overhead or underground assets in order to maintain compliance with NZECP34:2001 New Zealand Electrical Code of Compliance for Electrical Safe Distances, and to maintain optimum operation and safety around equipment associated with underground electricity distribution and fibre cables.

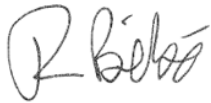
3.6 NoR 5, Drawing 5000 indicates the construction of a bridge over the rail corridor at Station Road, Pukekohe. This will impact the Pukekohe-Tuakau 110kV line which conveys electricity between the two zone substations. Early consultation and detailed planning will be required concerning works in the vicinity of this section of crucial infrastructure.

3.7 NoR 5, Drawing 5000 indicates alignment of a new road with associated cut and fill along the alignment of a section of the existing Bombay-Pukekohe 110kV line which is built within an easement between Station Road and Golding Road. Further detailed consultation will be required concerning the road design and construction round this line.

3.8 NoR 8, Drawing 8100, Mill Road. The alignment of the high voltage Bombay-Pukekohe (north) 110kV line is incorrect, where it crosses to the north side of Mill Road; and appears to be in area identified for future cut and installation of a culvert, both of which could compromise the safe operation of a critical asset. Further consultation and detailed planning is required.

CEL requests that Auckland Transport and Waka Kotahi respectively give consideration to the points raised above. We welcome the opportunity to discuss these matters further.

Yours faithfully

A handwritten signature in black ink, appearing to read 'R Bilbé', written in a cursive style.

Rachel Bilbé
Land and Easement Specialist

rachel.bilbe@countiesenergy.co.nz

027 622 5612

13 November 2023

Auckland Council
AUCKLAND

Sent via e-mail: unitaryplan@aucklandcouncil.govt.nz

Dear Sir/Madam

NOTICES OF REQUIREMENT 1 THROUGH 8 - PUKEKOHE

The Campaign for Better Transport Incorporated (**CBT**) wish to put forward our submission in relation to the following Notices of Requirement:

- Pukekohe: Drury West Arterial (NoR 1)
- Pukekohe: Drury – Pukekohe Link (NoR 2)
- Pukekohe: Paerata Connections (NoR 3)
- Pukekohe: Pukekohe North-East Arterial (NoR 4)
- Pukekohe: Pukekohe South-East Arterial (NoR 5)
- Pukekohe: Pukekohe South-West Upgrade (NoR 6)
- Pukekohe: Pukekohe North-West Upgrade (NoR 7)
- Pukekohe: Mill Road and Pukekohe East Road Upgrade (NoR 8)

Background

The CBT is always cautious when it comes to the construction of roading projects, and our default position would be one of opposition unless a solid case existed for the construction of the specific project involved.

The CBT is also mindful that in the relevant area:

- The railway line to Pukekohe is being electrified, with suburban service expected to be restored in next year. Assuming the initial timetable is consistent with service provided before the line closed for electrification works in 2022, this would mean a twenty-minute frequency between Pukekohe and the Auckland Central Business District during peak and a thirty-minute frequency during off-peak.
- Existing road infrastructure is unlikely to be fit for purpose in the coming decades. There needs to be separation between arterial routes and non-arterial routes and having non-arterial uses on an arterial route is not desirable from either a transport or an urban design perspective.

We make brief comments below, first in the general sense and then in relation to specific projects.

Cycle Infrastructure

We are heartened to see that cycle infrastructure is forming a significant component of the proposed routes, including the Drury-Pukekohe Link, and fully support this component of the proposals.

Twenty Year Lifespan

We note the resource consent has a lifetime of twenty years, which we agree with. The lifespan ensures the corridor is preserved and not developed on, but also means the impacts of rail electrification can be observed prior to construction work being undertaken.

Should the rail electrification have a material impact on traffic levels along the existing routes far and beyond that anticipated, then we would hope that the specifics of these projects are reconsidered in light of the changed facts.

Drury-Pukekohe Link (Pukekohe Expressway)

We are neutral when it comes to the Pukekohe Expressway. The construction of this road would enable the existing State Highway 22 to be downgraded to a non-arterial route and used accordingly (the best example might be the relationship between Great South Road and the Southern Motorway, with the former being used for local purposes and the latter being used as the major through route). The choice of route along the outskirts of the planned urban area is useful – this ensures no division of the urban area by a major road.

Mill Road

We are in favour of the planned upgrade to Mill Road. This road forms the primary link between Pukekohe, the Southern Motorway and the Waikato Expressway and is likely to continue doing so even once the new Pukekohe Expressway has been opened. We also note the road is currently hazardous, having had its speed limit decreased from 100km/h to 80km/h to reflect the dangerous conditions posed by this road. We anticipate the upgrades would ensure the road would become fit for purpose and improve safety outcomes.

A case could be made for the third and fourth lanes proposed to have some sort of restriction on them similar to such lanes along State Highway 20B (Puhinui Road). This might for instance take the form of a transit and heavy goods lane. We are mindful the road is in a primarily rural area and so demand flows are different to that within an urban area where bus lanes and the like would be more appropriate.

Pukekohe North-West Arterial and North-East Arterial

We are neutral when it comes to these roads. We see the value of these roads as providing a connection between the upgraded Mill Road and the routes heading to points west of Pukekohe (for example Waiuku) without road traffic needing to go through Pukekohe residential and commercial streets. We hope the opportunity would be taken to change the nature of some roads through Pukekohe to make them friendly toward other uses (for example, decreasing the speed limit of some roads through the Pukekohe village)

Pukekohe South-East Arterial and South-West Upgrade

We are neutral when it comes to these roads. We see the value of the South-East Arterial as providing a connection between the upgraded Mill Road and the routes heading to Tuakau and the northern Waikato without road traffic needing to go through Pukekohe residential and commercial streets (in particular, the King Street/Massey Avenue/Manukau Road/East Street roundabout).



Campaign For Better Transport

If Auckland Council have any further queries, please contact us at committee@bettertransport.org.nz. We will be pleased to comment further if requested.

Yours faithfully

The Campaign for Better Transport Incorporated

Jodi Johnston (Mr.)
Convenor

Submission opposing the notice of requirement NoR 2:Drury - Pukekohe link (Waka Kotahi (NZTA))

Afew of the many Reasons for opposing the proposed new state highway link on sim road.

Failure to communicate with local community with transparency, resulting in the ramifications of this project not being fully understood.

Placing a roundabout on a hill can pose challenges, as it may impact visibility for drivers, potentially leading to safety concerns. Additionally, navigating a roundabout on an incline can be more challenging for larger vehicles, affecting the overall efficiency and safety of the traffic flow.

Turning onto a highway can be challenging due to factors like high-speed traffic, limited acceleration space, and the need to match the speed of oncoming vehicles quickly. This requires careful judgment, proper timing, and sufficient acceleration to merge safely into the flow of traffic, all of which hasn't been discussed.

Pollution, Increased vehicular traffic on highways can result in air and noise pollution, potentially impacting the health of horticultural crops and ecosystems.

Balancing infrastructure development with sustainable practices is crucial to minimize negative impacts on horticulture, there are far more efficient and practical options.

Ngā mihi

From: [Hugh Ross](#)
To: [Submissions](#)
Subject: Sim Road Link
Date: Monday, 13 November 2023 7:32:45 pm

Submission to: Notice of Requirement, Drury Pukekohe (No R2)

If I was driving a car (or a 55 ton truck and trailer unit) from Glenbrook and heading South I would stay on SH22 and join SH 1 at Drury.

If I were coming from the South on SH1 and heading West I would turn off at Drury.

There would be no advantage in using Sim Road as a link, as it involves two extra roundabouts plus a steep hill.

If I were coming from the North on SH1 and heading for Pukekohe I would turn off at Drury South and take the new road.

If I were going North from Pukekohe I would use the new road to Drury South, then North on SH1.

Again there would be no advantage in using the Sim Road link for these two trips.

Hugh and Rae Ross

111A Sim Road

Karaka

13th November 2023

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:898] Notice of Requirement online submission - Anthony van Schalkwyk
Date: Wednesday, 18 October 2023 10:45:43 pm

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

Contact details

Full name of submitter: Anthony van Schalkwyk

Organisation name:

Full name of your agent:

Email address: anthonyvs100@gmail.com

Contact phone number:

Postal address:

165 Mill Road

Bombay RD1

Auckland 2765

Submission details

Name of requiring authority: Waka Kotahi NZ Transport Agency

The designation or alteration: Pukekohe : NOR 8 Mill Road and Pukekohe East Road Upgrade

The specific provisions that my submission relates to are:

I own and live at 165 Mill Road, Bombay

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

The reason for my or our views are:

I notice from your general layout plan that the road layout at the entrance to 165 Mill Road appears to be two lanes in each direction, that is a total of four lanes. There is an orange strip between the two sets of two lanes. Is the intention for people driving to the property 165 Mill road approaching from the Bombay side, to move over onto the orange strip and await a gap in the oncoming traffic before turning right into 165 Mill Road.

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

Please explain to me that you have provided a safe and efficient option for the numerous people accessing the rural road on 165 Mill Road. It is especially dangerous when driving from the Bombay side towards Pukekohe. People going to 165 Mill Road need to have a safe holding area waiting for a gap in the oncoming traffic before turning right. There is a massive danger of a vehicle running into your back, whilst you are stationary and waiting to turn right.

Submission date: 18 October 2023

Attend a hearing

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

Declaration

I accept and agree that:

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

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

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From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:910] Notice of Requirement online submission - yunmin Ma
Date: Thursday, 2 November 2023 11:30:57 am

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

Contact details

Full name of submitter: yunmin Ma

Organisation name: AMJG Investment

Full name of your agent:

Email address: adam.ma@outlook.com

Contact phone number: 021 2388566

Postal address:
10 Gillard Place
Eastern Beach
Manukau
Auckland 2012

Submission details

Name of requiring authority: Waka Kotahi NZ Transport Agency

The designation or alteration: Pukekohe : NOR 8 Mill Road and Pukekohe East Road Upgrade

The specific provisions that my submission relates to are:

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

The reason for my or our views are:
It's a rental property, not sure how bad will effect the tanents.

I or we seek the following recommendation or decision from Auckland Council:
Is there compensations?

Submission date: 2 November 2023

Attend a hearing

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

Would you consider presenting a joint case at a hearing if others have made a similar submission?
No

Declaration

I accept and agree that:

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

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From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:923] Notice of Requirement online submission - Cade Hubert Daroux
Date: Thursday, 9 November 2023 11:46:06 AM
Attachments: [NORsubAC91123.pdf](#)

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

Contact details

Full name of submitter: Cade Hubert Daroux

Organisation name:

Full name of your agent:

Email address: cadedx@gmail.com

Contact phone number: 092388411

Postal address:
P O Box 692 Pukekohe
Pukekohe
Pukekohe 2340

Submission details

Name of requiring authority: Waka Kotahi NZ Transport Agency

The designation or alteration: Pukekohe : NOR 8 Mill Road and Pukekohe East Road Upgrade

The specific provisions that my submission relates to are:
The proposed changes to the Roding network in the Pukekohe area

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

The reason for my or our views are:
See my submission attached

I or we seek the following recommendation or decision from Auckland Council:
see my submission attached

Submission date: 9 November 2023

Supporting documents
NORsubAC91123.pdf

Attend a hearing

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

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

Declaration

I accept and agree that:

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

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

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SUBMISSION BY C.H. AND C.K.DAROUX

A letter from the Auckland Council dated 11 October 2023, received by us about 20 October, has advised us of nine Notices of Requirement affecting our Pukekohe property, with the last day for filing a submission on these being 13 November 2023. We have just returned to New Zealand after about two months overseas catching up on those things we could not do during the Covid pandemic. Had the deadline been during that period we note we would have lost the option of making a submission. Over the 34 years we have owned this property there have been many proposals for developments in the area and for changing the public corridors through it. This is the first notice of requirement and by luck we get only about 24 days to have a say regarding this proposed development.

There is growing pressure on the transport system in the Pukekohe area and we expect this will increase. Here and overseas the best way to deal with traffic pressure has been found to be the building of straight, direct, fast dual-lane expressways. The single most successful roading development in the Auckland area has been the Southern Motorway, which has provided brilliant service to the community for a long time. It has been so successful that the building of additional and support structures around it has lagged, and it has become clogged and inefficient -- but that is not a criticism of the motorway.

It is difficult, expensive and destructive to try to turn a two-lane local road into an expressway and the result creates the continuing problem of through traffic conflicting with local traffic, roadside activities and other modes of travel to the detriment of both through traffic and local traffic. For that reason, we favour a development along the lines of package 4 of the alternatives outlined on the council website, providing for a separate expressway, where the council considers it would be most useful, through greenfields. Once the through traffic has been separated, developments for the local roads remaining become much simpler. A more satisfactory result can be achieved with less destruction of existing arrangements, less delay, and hopefully less cost overall. Trying to upgrade local roads only inevitably results in short-term measures which will then need to be revisited and revisited as the area develops, duplicating the destruction, disruption to landowners and cost.

The council letter of 11 October advised us of a notice of requirement affecting our property at 140 Pukekohe East Rd, Pukekohe, being Part lot 1 Deposited Plan 62212 and Lot 1 Deposited Plan 80314 and being the land comprised and described in Certificate of Title NA75B/453 North Auckland Registry. The part of the property adjoining Pukekohe East Rd appears to be zoned for future developments although we are advised that such zoning permits us to carry on only farming activities. Unfortunately, since the property has acquired that zoning its rates have more or less quadrupled, making farming activities hopelessly uneconomic. That and the quickly changing local environment is forcing us to address the options we have with our future development zone sooner rather than later. Should the designations proposed proceed we expect we will need to pursue the procedure set out in section 185 of the Resource Management Act 1991.

The letter of 11 October does not give us a copy of any notices of requirement or set out how they specifically affect our property. It provides references to the websites for the Auckland Council and the Waikato District Council, upon which we note there are in fact two notices of requirement (appallingly set out) which directly affect our property being:

1. Notice of Requirement for a Designation of Land under Section 168 of the Resource Management Act 1991 dated 27 September 2023 applying to an area of land of about 11.7 hectares located between Pukekohe East Rd, Pukekohe and the Bombay interchange on Mill Rd, Bombay "... included in Attachment A of this Notice (NoR8) ...". Attachment A compiles a series of drawings with few references, measurements or marks but does contain

a reference 608893 to our property, advising that about 2147 m² of our land is to be designated. However, there are no measurements, directions, tags or descriptions to show what that area is and its dimensions and is therefore inadequate, defective and/or a nullity and the Notice should be struck out.

2. Notice of Requirement for a Designation of Land under Section 168(2) of the Resource Management Act 1991 dated 2 October 2023 applying to an area of land of the proposed Pukekohe South-East Arterial – NoR 5 “... shown on the Designation Plans included in Attachment A of this notice...”. Attachment A compiles a series of drawings with few references, measurements or marks, but does contain a reference 608893 to our property which advises that about 3205 m² of our land is to be designated. Again, there are no measurements, directions, tags or descriptions to show what that area is and its dimensions and is therefore inadequate, defective and/or a nullity and the Notice should be struck out.

We will file this submission separately for each of these notices to record our opposition to these proposals. Although the requiring authority for the first notice is Waka Kotahi NZ Transport Agency and for the second is Auckland Transport, these entities are working together with or for the Auckland Council which appears to have been organising the enormous amount of work that has been done. We will refer to that council but intend references to include the requiring authorities also where appropriate.

We have attended many meetings, speeches, discussion groups and presentations regarding proposed developments in the Pukekohe area over the years and have noted many plans for roading development in the area organised by the Franklin District Council and/or the Auckland Regional Council. We see some of these have been considered at least in part in the various suggestions set out in the council's Urban Design Evaluation. We expect that process will continue and the current thinking on what to do will change over time and will be modified by the developments which may be implemented by private interests around the roading network and by the council and others. We have seen some reports and documents regarding the Auckland Council's ideas and earlier this year we were invited to speak to council representatives about the road proposals. The representatives gave us a broad indication of the coming proposals but were not able to give us details on how that would affect our property. We raised some concerns and were advised to file submissions when the notification process began. We have not been visited or contacted by council staff to advance this or to consider whether the council can take an interest over our property or acquire the property or part of it.

Our property is used for pastoral farming and is about 1km from the Pukekohe built-up area. We are advised that several private applications have recently been granted to change parts of the future development zone between us and the built-up area to residential use and these now come up to part of our western boundary. There is also a group of rural residential properties beside Pukekohe East Rd in front of that western boundary. The front of our farm is now in the future development zone, which ends at our eastern boundary. During the 1990s Pukekohe East Rd was upgraded to widen and improve the road surface and to deal with some historical issues arising from previous road straightening. As part of this work a third lane of tar seal was installed in front of our property to provide a passing lane for traffic moving from Pukekohe towards Bombay. Since then, a series of changes were made to the intersection of Golding Rd and Pukekohe East Rd, culminating in the installation of a new roundabout which has been reasonably successful.

Most people in the Pukekohe area are focused on Auckland and choose to travel north along the State Highway 22 through Paerata to Drury. When the Auckland Southern Motorway was extended past Bombay, Pukekohe East Rd attracted more interest from travellers and the road has become

busier. We presume the road is mainly 20m wide along our boundary, which would approximate our measurements from fence to fence, although there is a road reserve on the northern side of the road resulting from a previous road realignment. The present road supports three lanes tar sealed for road traffic, and a shoulder, small bank and drain on each side. Over the past 30 years we have developed at considerable effort and expense a line of cherry, pohutakawa and pittosporum trees along our northern boundary adjacent to the road. They have been planted with gaps but provide a valuable physical barrier between the private rural property and the invasive public road and our neighbour to the east has continued the line with pittosporum trees along their frontage. The trees provide protection from the noise, sound and dust and some vibration from road users and at night substantially reduce the light pollution of vehicles and we would like to think that they beautify and enhance the area and improve the local amenity. They also protect road users from the prevailing south-westerly winds. Those benefits would continue to be appreciated by urbanised users of the property.

The council documents propose a new shared pedestrian and cycle path be erected along the southern side of the road and have indicated an area about 6m wide as being required for this. It is not clear how much of this 6m gap can be accommodated on the existing road and how much new ground the council demands from neighbouring properties. There is room on the existing road to install a footpath or footpaths on the existing area. We have ridden on many of the cycle ways and shared cycle paths in the Auckland area and most appear to be about 1-1.5m wide. Some have been a bit wider, but we struggle to see how 6m could be employed. We note a car lane is usually about 3m wide and that the council has contemplated four-laning the full length of Mill Rd and Pukekohe East Rd. It has indicated that providing four lanes at Mill Rd requires a road corridor 30m wide but where it proposes a two-lane road it indicates that a corridor 24m wide is sufficient for two road lanes, two walking paths, two cycling paths and seven medians, including two wide enough to support tree planting. We seek a solution that preserves our trees and object to their removal.

The council proposes installing a path on the southern side of Pukekohe East Rd but not having a path on the northern side of the road. We submit that this is a bad decision that will in time be regretted and reversed and a path will be installed on the northern side of the road, whether or not a path is present on the south side of the road, because:

1. The only footpath now on Pukekohe East Rd connects to one on East St coming out of Pukekohe and is on the north side. It extends in front of the Anselmi residential subdivision on the north side of Pukekohe East Rd up to Anselmi Ridge Rd. There is no footpath on the southern side coming out of Pukekohe on East St and up to Golding Rd. It is sensible to extend the existing path further along Pukekohe East Rd on the northern side before contemplating creating a new path on the southern side of the road now or in the future.
2. The council is concerned to not damage the Pukekohe East tuff ring. We have not identified in the documents what the Pukekohe East tuff ring is and where it is but we note that the council reports indicate that it is at present under Pukekohe East Rd and extending each side of it along part of that road in both the areas for designation Nor 5 and NOR8. Building a path beside the existing road will cause minimum damage to the tuff ring on whatever side of the road it is, but if a path is built on the southern side of the road and as we suggest a path will be recognised as needed on the north side of the road anyway there will be double damage.
3. The Pukekohe East crater lies to the north of Pukekohe East Rd and that road at present runs along that crater's edge. While there are many craters in the Auckland area, this crater is in remarkably good condition and is accessible to the public from Pukekohe East Rd and Runciman Rd to view as they drive past. Brave souls can choose to pull over to the shoulder

on the northern side to have a better look at the crater, which at present supports a polo field on the crater floor. The council suggests that a path on the southern side of Pukekohe East Rd will give an enhanced view of the crater, but this is rubbish. A path on the southern side of the road will give an enhanced view of three lanes of tar seal. Once the council has destroyed and removed all our trees and the neighbours' trees on the southern side of the road, a path on the south side will give a view of paddocks and in due course of urban living, plus a blast from the south-westerly winds. To gain an enhanced view of the crater, passersby would have to pull over to the north side of the road while driving west, as they do now, or walk across the vehicle lanes from the southern path. Not a satisfactory result. Many areas would value an unusual and interesting feature such as this and would try to make it available to the public and even perhaps create a viewing platform or area to assist this and improve local amenity. By placing the path on the southern side of the road the council deprives itself of the opportunity of creating such a viewing area or platform for the community.

4. Following previous road realignments there are several sections of road reserve beside Pukekohe East Rd. We have mentioned one on the northern side of the road opposite our property. At the top of the hill to the west is also a long section of road reserve. At the moment it's used as a gravel dump, although its eastern end can be used for parking for the Pukekohe East community hall and tennis court. These areas are already publicly owned and can be used for a path as well as supporting complementary facilities on the road's northern side. A path on the southern side of the road would require the acquisition or expropriation of private land, the destruction of private developments and rights for an area which cannot be incorporated and combined with the existing public areas on the other side of the road.
5. We see very few people walking along Pukekohe East Rd. There are a growing number of cyclists who use it. Clubs and groups normally travel in a mob, fast, wearing bright clothing using a car lane. We doubt they would change this practice. That leaves walkers and local cyclists etc and they would mainly use a pathway for access to and from the Anselmi residential subdivision, the new road the council proposes to build north of Pukekohe East Rd, to view the Pukekohe East crater, to reach of the Pukekohe East Hall and tennis centre or to go up Runciman Rd to the Pukekohe East residential area and school. All the areas likely to attract walkers and cyclists are on the northern side of the road.
6. The council shows concern for removing some trees on the northern side of Pukekohe East Rd should they decide to do work there. However, the same concern is not shown for removing numerous trees and lines of trees on the southern side of the road which are valuable to the tree owners and the community and the amenities of the area.
7. The land south of the Pukekohe East crater to the east of our property rises above the lip of the crater and a spur of that elevated area runs north into the crater. Pukekohe East Rd has been cut through that spur leaving a long, steep, high bank beside the carriageway on the southern side and a smaller steep bank on the northern side of the carriageway. Any road widening will require digging into those banks. A great deal more work and damage is required for a path on the southern side of the road.

A designation for 20 years

The Auckland Council proposes that the providing of a designation gives the people of the South Auckland area certainty that a roading system will be upgraded in the places as proposed by the council. This is not correct.

Under sections 9 and 176 of the Resource Management Act 1991 a designation on the district plan appears to work as a resource consent for the doing of the work allowed in the designation. They are in addition to any front-yard requirements in the district scheme. It does not permit or require the council to enter private property or do any work or make any alteration to a private property.

Therefore the people of the area can have no confidence that what the council now proposes can or will be done now or at any time in the future. However, under section 176 (b) no person (including the landowner) may without the prior written consent of the requiring authority concerned do anything in relation to the land subject to the designation that would prevent or hinder the proposed work, including any use of the land or subdivision of land or changing the character, scale or intensity of the use of the land.

So while the landowners affected by the designation have no certainty of receiving any benefit, they suffer severe restriction on their activities and rights of ownership of the property concerned for the period of the designation. For that loss and restriction of their rights they receive no consideration or compensation. This council acknowledges that while it has done a detailed business case for the development its plans are still in the concept stage and considerable detailed work is required, together with numerous more reports plans and investigations, before they do any work. For these reasons and the reasons given above we submit that the proposal which the notices of requirement set out is too vague, not clearly established and is not the best result or alternative available to show that the designations should be placed on the properties concerned.

The legislature has sought to limit the restriction and damage which can be created by the use of designations by placing a time limit before which the designation should lapse.

Under section 184 that time limit is five years unless a different time limit is stated, or a limit is extended. We submit that the council has not provided grounds which would justify an extension of a designation for longer than five years.

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:927] Notice of Requirement online submission - Maimere Properties Ltd
Date: Thursday, 9 November 2023 10:00:59 PM

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

Contact details

Full name of submitter: Maimere Properties Ltd

Organisation name:

Full name of your agent: Lachlan Johnstone

Email address: martha.johnstone@xtra.co.nz

Contact phone number: 021777415

Postal address:

martha.johnstone@xtra.co.nz

Pukekohe East

Pukekohe East 2677

Submission details

Name of requiring authority: Waka Kotahi NZ Transport Agency

The designation or alteration: Pukekohe : NOR 8 Mill Road and Pukekohe East Road Upgrade

The specific provisions that my submission relates to are:

197 Pukekohe East Rd, RD 2, Pukekohe, 2677

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

The reason for my or our views are:

We would require clarity on the likelihood of acceptance of the conditions listed below prior to deciding whether we are for or against the current proposal

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

We would require repositioning of our entrance way to allow for safe access to and from our property. We would require engineered storm water retention/detention systems to effectively manage all storm water coming off the roads. The current stormwater management mechanisms are ineffective and contribute to the degradation of the ONF (Outstanding Natural Feature) alongside the road. We would require remediation of the roadside area with effective road noise reduction in the form of a berm or similar structure that will be planted to enhance the natural environment surrounding the ONF. Replacement of all affected boundary fences to an acceptable standard that prevents stock from leaving, and unauthorised people from entering, the property. (Currently fenced for Deer to 1.9m high) Speed limit reduction to allow for safer egress for all property owners on the road, particularly as traffic volumes are forecast to increase. This would also assist with road noise mitigation. Regulation that stipulates nonuse of Engine braking by all Heavy Vehicles on Pukekohe East Rd and Mill Rd.

Submission date: 9 November 2023

Attend a hearing

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

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

Yes

Declaration

I accept and agree that:

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

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From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:928] Notice of Requirement online submission - MC Johnstone LJC Johnstone LF Williams
Date: Thursday, 9 November 2023 10:15:58 PM

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

Contact details

Full name of submitter: MC Johnstone LJC Johnstone LF Williams

Organisation name:

Full name of your agent: Martha Johnstone

Email address: martha.johnstone@xtra.co.nz

Contact phone number: 021 777 415

Postal address:

martha.johnstone@xtra.co.nz

Auckland

Auckland 2677

Submission details

Name of requiring authority: Waka Kotahi NZ Transport Agency

The designation or alteration: Pukekohe : NOR 8 Mill Road and Pukekohe East Road Upgrade

The specific provisions that my submission relates to are:

197 Pukekohe East Road, RD2 Pukekohe 2677

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

The reason for my or our views are:

We would require clarity on the likelihood of acceptance of the conditions listed below prior to deciding whether we are for or against the current proposal

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

We would require repositioning of our entrance way to allow for safe access to and from our property. We would require engineered storm water retention/detention systems to effectively manage all storm water coming off the roads. The current stormwater management mechanisms are ineffective and contribute to the degradation of the ONF (Outstanding Natural Feature) alongside the road. We would require remediation of the roadside area with effective road noise reduction in the form of a berm or similar structure that will be planted to enhance the natural environment surrounding the ONF. Replacement of all affected boundary fences to an acceptable standard that prevents stock from leaving, and unauthorised people from entering, the property. (Currently fenced for Deer to 1.9m high) Speed limit reduction to allow for safer egress for all property owners on the road, particularly as traffic volumes are forecast to increase. This would also assist with road noise mitigation. Regulation that stipulates non-use of Engine braking by all Heavy Vehicles on Pukekohe East Rd and Mill Rd.

Submission date: 9 November 2023

Attend a hearing

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

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

Yes

Declaration

I accept and agree that:

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Form 21

Submission on requirements for designations

To: Auckland Council
Private Bag 92300
Auckland 1142
unitaryplan@aucklandcouncil.govt.nz

Waikato District Council
Private Bag 544
Ngaruawahia
3742
info@waidc.govt.nz

Name of submitter: Aotearoa Towers Group (ATG)
Trading as FortySouth
Private Bag 92161
Auckland 1142

Chorus New Zealand Limited (Chorus)
PO Box 632
Wellington

Connexa Limited (Connexa)
167 Victoria St West
Auckland

One New Zealand (One NZ) (formally Vodafone New Zealand Ltd)
Private Bag 92161
Auckland 1142

Spark New Zealand Trading Limited (Spark)
Private Bag 92028
Auckland 1010

These parties are making a joint submission and for the purposes of this submission are referred to collectively as the ***Telecommunications Submitters***.

The Proposal:

This is a submission on the following notices of requirement by Auckland Transport and Waka Kotahi NZ Transport Agency for transport projects in Pukekohe, Paerata and Drury in South Auckland:

- Pukekohe Transport Plan NoR 1: Drury West Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 2: Drury – Pukekohe Link (Waka Kotahi NZ Transport Agency)
- Pukekohe Transport Plan NoR 3: Paerata Connection (Auckland Transport)
- Pukekohe Transport Plan NoR 4: Pukekohe North-East Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 5: Pukekohe South-East Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 6: Pukekohe South-West Upgrade (Auckland Transport)
- Pukekohe Transport Plan NoR 7: Pukekohe North-West Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 8: Mill Road and Pukekohe East Road Upgrade (Waka Kotahi NZ Transport Agency) (Auckland Council and Waikato District Council)

The Telecommunications Submitters are not trade competitors for the purposes of section 308B of the Resource Management Act 1991.

The specific parts of the notice of requirement that this submission relates to are:

The conditions of the designations that relate to Network Utility Operators and the Land Use Integration Process (LIP).

The Telecommunications Submitters' submission is that:

The Telecommunications Submitters have no position on the overall Pukekohe to Drury package of transport projects but seek to ensure that existing and potential future telecommunications infrastructure in the project corridors are adequately addressed.

The Telecommunications Submitters **oppose** the proposed designations unless the matters outlined in this submission are satisfactorily addressed.

The organisations collectively deliver and manage the majority of New Zealand's fixed line/fibre and wireless phone and broadband services in New Zealand. The network utility operators in the telecommunications sector deliver critical lifeline utility services (as per Schedule 1 to the Civil Defence Emergency Management Act 2002) including infrastructure to support emergency services calls. It is also crucial for supporting social and economic wellbeing and measures to reduce travel demand. It provides opportunities for work from home/remote work solutions through fast internet connections by fibre and/or wireless means which promotes a lower carbon economy.

The equipment used to deliver this is often located in road corridors which act as infrastructure corridors as well as just transport corridors. The works enabled by the proposed designations will affect existing infrastructure that will need to be protected and/or relocated as part of the proposed works. The design and construction of the works should take into account any opportunities for new infrastructure to be installed which is preferable than trying to retrofit necessary telecommunications/ broadband infrastructure later due to disruptions and/ or incompatibility with project design.

Existing Infrastructure

A summary of existing infrastructure located in the project footprints is as follows and is outlined in more details viewable in **Appendix A**:

- FortySouth Facility: Pole located at the Belgium Road Intersection in NoR 5 (supporting One NZ network).
- FortySouth Facility: Pole located at 122 Princes St W in NoR 6 (supporting One NZ network).
- Connexa Facility: Found at Belgium Road Intersection in NoR 5 (supporting Spark network).
- Connexa Facility: 59 Ward Street in NoR 6 (Supporting 2degrees network).
- Connexa Facility: Pole on Puni Road in NoR 6 (Supporting Spark network).
- Chorus has extensive fibre and copper lines networks throughout the project area.
- Mobile operators are progressively rolling out roadside equipment and fibre routes in Auckland roads which may be within project corridors when works proceed.

Future Infrastructure Requirements

Network utility operators need to integrate necessary services into infrastructure projects such as transport projects. This is especially significant for future development with the introduction of advanced technology such as 5G infrastructure, which will be crucial to transport infrastructure. It is most efficient to coordinate any such services with the design and construction of a project, rather than trying to retrofit

them at a later date. This process does not always run smoothly. To provide a previous example, Spark had substantial issues trying to negotiate with the Public Private Partnership (PPP) operator of the Transmission Gully project in the Wellington Region to install services to provide telecommunications coverage. This process proved to be very difficult as there was no requirement to consult and work with relevant network utility operators in the designation conditions, and post completion of the project design and PPP contracting, it proved to be very challenging to try to incorporate necessary telecommunications infrastructure into the design of this project. Connexa is already planning for potentially up to three additional mobile sites along the proposed designation corridors.

Spark achieved a more satisfactory outcome through participation as a submitter in the Auckland East West Link and Warkworth to Wellsford (W2W) project designation conditions where there was a specific obligation for the Requiring Authority to consult with network utility operators as part of the detailed design phase of the project to identify opportunities to enable the development of new network utility including telecommunications infrastructure where practicable to do so¹. While the Telecommunication Submitters are not asking for the exact same outcomes of these examples, it demonstrates mutual benefits with ease of collaboration, communication and cohesive infrastructure development.

This is reflected in more recent times in two separate occasions earlier this year where Auckland Transport and Waka Kotahi agreed to amend their proposed Network Utility Management Plan (NUMP) conditions to involve network utility operators during the design phase, as well as the inclusion of Land Integration Process (LIP) conditions on Auckland Transport designations. Satisfactory conditions in this regard have been agreed with the requiring authorities in the Airport to Botany and North West Transport Projects (aside to an equivalent approach to the LIP condition for Waka Kotahi designations). However, those agreed amendments to the NUMP condition have not been carried through to the Pukekohe to Drury NoRs.

All NoRs include a NUMP condition in the general conditions (26 for Auckland Transport and 25 for Waka Kotahi), which is not the same as the previously and recently agreed upon NUMP condition wording for the other abovementioned projects. The NUMP conditions used in the Pukekohe to Drury Project NoRs do not include the updated clause “(d) *the development of the NUMP shall consider opportunities to coordinate future work programmes with other network utility operator(s) **during detailed design** where practicable.*”

¹ East West Link Condition NU2, W2W Condition 24A

Whilst there is no direct obligation on the requiring authority to accommodate such works/opportunities, it is reasonable for there to be provisions to ensure the matter is properly considered during the design phase through consultation with network utility operators as it sets appropriate expectations and ensures these opportunities are properly explored. This enables proper consideration of making provision for communications infrastructure that support the function of the roads and/or serves adjacent growth. This should be a consideration distinct from protecting or relocating existing network utilities affected by the project which has previously been the focus of conditions to manage network utilities.

Whilst the LIP condition on Auckland Transport 's proposed designation now matches changes agreed on the other projects, there is still no equipment process for the proposed Waka Kotahi designations in this project to ensure the various telecommunications network providers are properly identified and engaged at relevant project stages.

Consultation with Telecommunications Network Utility Operators

Key to the outcomes the Telecommunications Submitters are seeking is to ensure they are adequately consulted by the requiring authorities over effects on their existing infrastructure, as well as being provided the opportunity to discuss any future requirements so this can be considered in the project design.

The Assessment of Environmental Effects (AEE) for each notice sets out the relevant utility providers who have assets within and around the proposed designations and is listed in the Network Utility Effects section. However, none of the Telecommunication Submitters are listed within the affected Utility Providers despite having existing infrastructure within and around the proposed designated boundaries. Therefore, it is a concern they will not be consulted as part of the NUMP development for each stage.

Spark and One NZ operate mobile phone/wireless broadband networks that are often located on facilities located in or adjacent to roads, while Chorus operate fixed line assets in roads including fibre. In addition, Spark has sold its fixed mobile asset infrastructure (e.g. their poles) to Connexa who are also acquiring the fixed assets of 2degrees, and similarly One NZ has sold its fixed mobile assets to Aotearoa Towers Group (trading as FortySouth). Accordingly, the operating landscape for telecommunications companies and who may be affected by these projects has become quite complex. Given this complexity, an advice note to the NUMP condition for the Waka Kotahi designations is proposed to provide more clarity on which telecommunications/broadband operators may be affected and to enable an engagement process to be established as the projects advance. This is not required for the Auckland Transport conditions given the LIP condition.

Land Use Integration Process (LIP)

Auckland Transport included a satisfactory LIP condition within their NoR's which are listed below. This reflected their previous requested changes to clause (f) and (f)(iii) and agreed upon for the Airport to Botany and Northwest Projects NoRs.

However, the following NoR's lodged by Waka Kotahi did not include LIP conditions:

- Pukekohe Transport Plan: Drury – Pukekohe Link (Waka Kotahi NZ Transport)
- Pukekohe Transport Plan: Mill Road and Pukekohe East Road Upgrade (Waka Kotahi NZ Transport) (Auckland Council and Waikato District Council)

The exclusion of LIP conditions creates a potential lack of integration and dialogue between the project teams and existing infrastructure providers such as the Telecommunications Submitters. This may compromise effective collaboration, cohesiveness and proper exploration of opportunities with regard to future infrastructure requirements being integrated into these projects. The Telecommunication Submitters are seeking relief in the form of satisfactory LIP conditions (equivalent to the Auckland Transport conditions) to be included within the two Waka Kotahi NoRs, or an alternative condition of like effect in regard to addressing the issues raised by the Telecommunications Submitters, or an advice note to the NUMP condition to clearly identify the current major network providers operating fibre and mobile phone/wireless broadband networks.

The Telecommunications Submitters seeks the following decision from the Requiring Authorities:

Amend the NUMP condition for each notice of requirement, as follows:

Network Utility Management Plan (NUMP)

(a) A NUMP shall be prepared prior to the Start of Construction for a Stage of Work.

(b) The objective of the NUMP is to set out a framework for protecting, relocating and working in proximity to existing network utilities. The NUMP shall include methods to:

(i) provide access for maintenance at all reasonable times, or emergency works at all times during construction activities;

(ii) protect and where necessary, relocate existing network utilities;

- (iii) manage the effects of dust and any other material potentially resulting from construction activities and able to cause material damage, beyond normal wear and tear to overhead transmission lines in the Project area; and*
- (iv) demonstrate compliance with relevant standards and Codes of Practice including, where relevant, the NZECP 34:2001 New Zealand Electrical Code of Practice for Electrical Safe Distances 2001; AS/NZS 4853:2012 Electrical Hazards on Metallic Pipelines; and AS/NZS 2885 Pipelines – Gas and Liquid Petroleum.*
- (c) The NUMP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project.*
- (d) The development of the NUMP shall consider opportunities to coordinate future work programmes with other Network Utility Operator(s) during detailed design where practicable.*
- (e) The NUMP shall describe how any comments from the Network Utility Operator in relation to its assets have been addressed.*
- (f) Any comments received from the Network Utility Operator shall be considered when finalising the NUMP.*
- (g) Any amendments to the NUMP related to the assets of a Network Utility Operator shall be prepared in consultation with that asset owner*

Add an advice note to the NUMP condition for the Waka Kotahi designations unless a Land Integration Process LIPcondition or similar is added in the alternative


Advice Note:

For the purposes of this condition, relevant telecommunications network utility operators include companies operating both fixed line and wireless services. As at the date of designation these include Aotearoa Towers Group (FortySouth), Chorus New Zealand Limited, Connexa Limited, One New Zealand Limited, Spark New Zealand Trading Limited, Two Degrees Mobile Limited (and any subsequent entity for these network utility operators).

Add a LIP condition equivalent to that proposed for the Auckland Transport designations, or any alternative mechanism ensuring there is a process for the project teams for the Waka Kotahi designations to properly identify and engage with relevant telecommunication network utility operators as part of project design.

The Telecommunications Submitters do wish to be heard in support of its submission.

If others make a similar submission, the Telecommunications Submitters will consider making a joint case with them at the hearing.



Signature of submitter
(Chris Horne, authorised agent for the Telecommunications Submitters)

Date: 10 November 2023

Address for service of submitter:

Chris Horne

Incite

PO Box 3082

Auckland

Telephone: 0274 794 980

E-mail: chris@incite.co.nz

Appendix A

Impacted Telecommunication Facilities

Telecommunication Sites Impacted

FortySouth

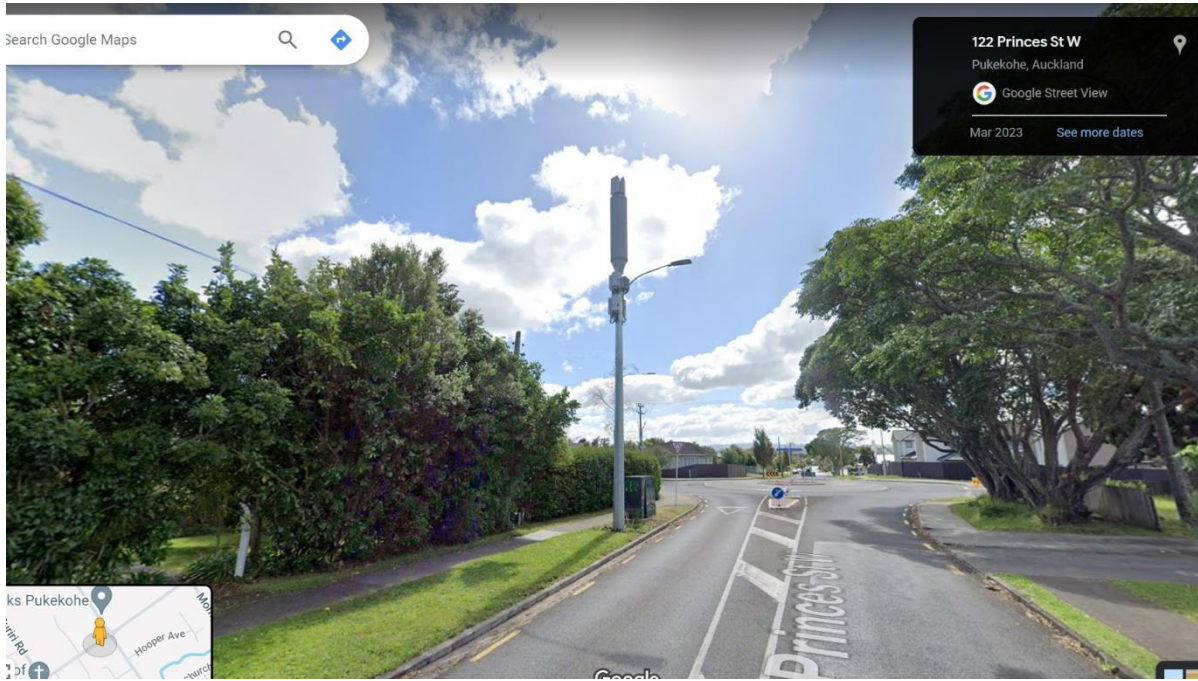
NoR 5 - Pukekohe South-East Arterial (Auckland Transport)

- Pole located at the Belgium Road Intersection in NoR 5 (supporting One NZ network)



NoR 6 - Pukekohe South-West Upgrade (Auckland Transport)

- Pole located at 122 Princes St W in NoR 6 (supporting One NZ network)



Connexa

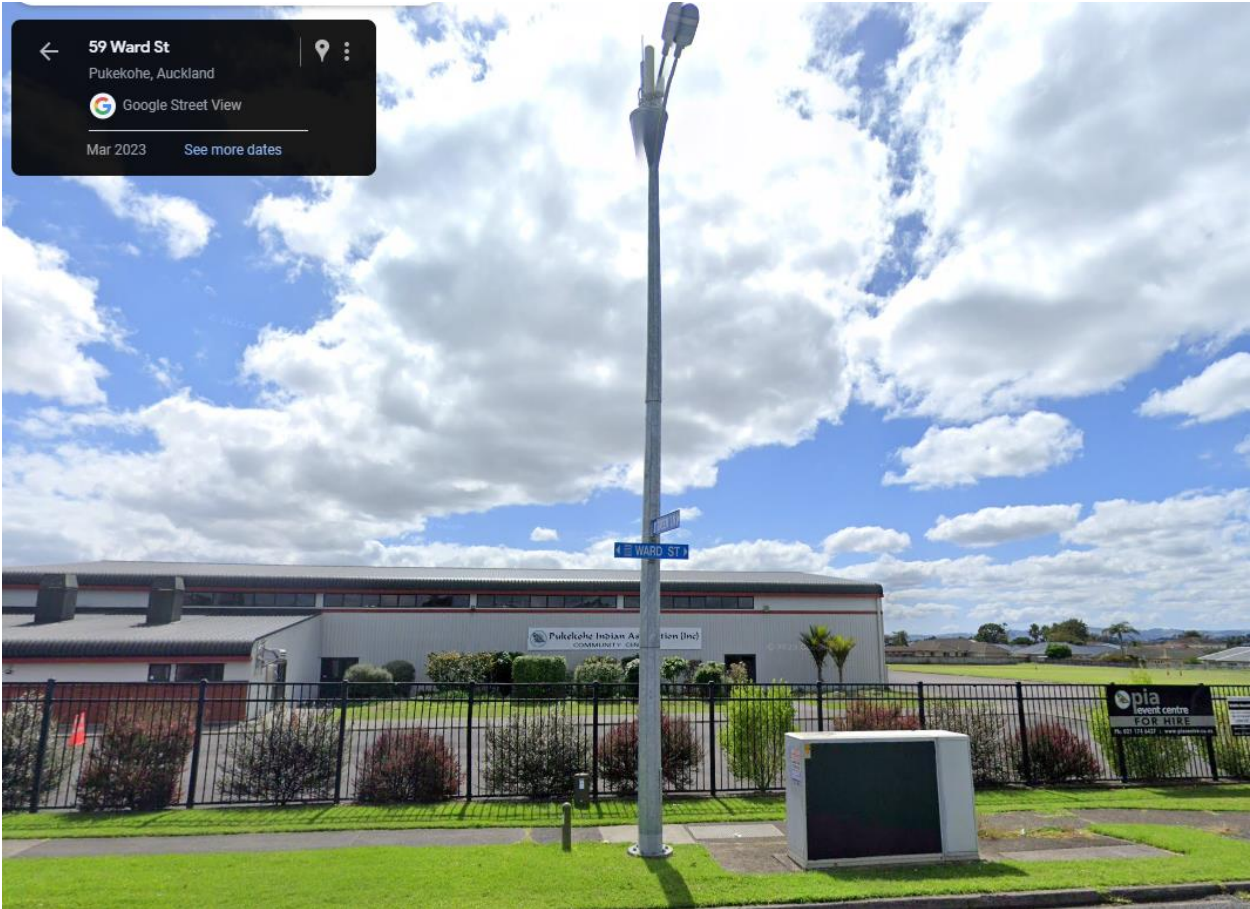
NoR 5 - Pukekohe South-East Arterial (Auckland Transport)

- Pole located at the Belgium Road Intersection in NoR 5 (supporting Spark network)



NoR 6 - Pukekohe South-West Upgrade (Auckland Transport)

- 59 Ward Street in NoR 6 (Supporting 2Degrees network)

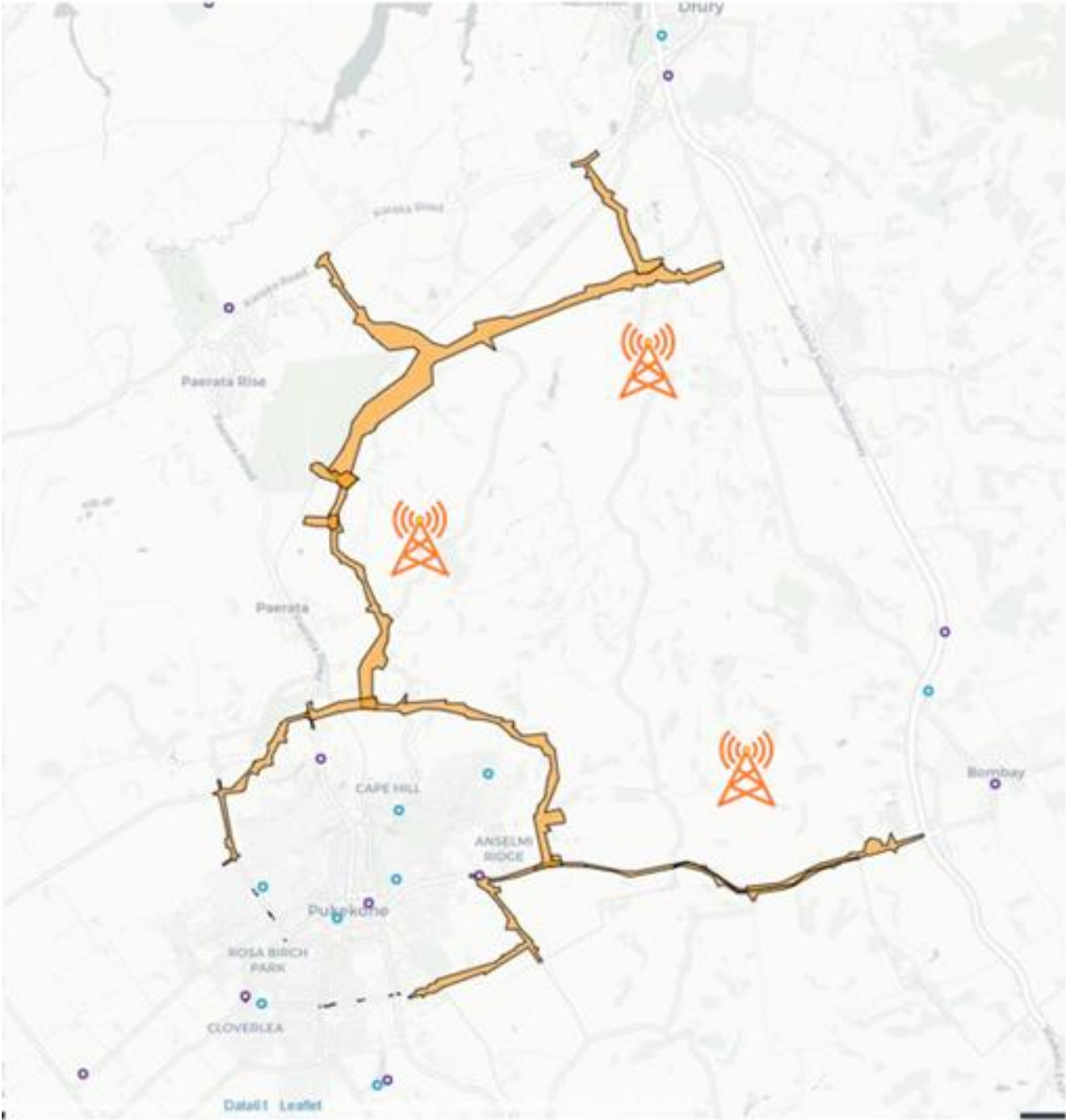


NoR 6 - Pukekohe South-West Upgrade (Auckland Transport)

- Pole on Puni Road in NoR 6 (Supporting Spark network)



Connexa Indicative Future Site Requirements



The yellow transmission pole symbols are indicative future Connexa sites. The proposed new locations are

- Runciman South
- Paerata
- Bombay West

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:930] Notice of Requirement online submission - Chaein Jeon
Date: Friday, 10 November 2023 6:30:28 PM

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

Contact details

Full name of submitter: Chaein Jeon

Organisation name:

Full name of your agent:

Email address: Chaein.jeon@gmail.com

Contact phone number: 021 187 5731

Postal address:
197a Pukekohe East Road
Pukekohe East
Pukekohe 2677

Submission details

Name of requiring authority: Waka Kotahi NZ Transport Agency

The designation or alteration: Pukekohe : NOR 8 Mill Road and Pukekohe East Road Upgrade

The specific provisions that my submission relates to are:

I am the co owner of a property addressed 197a Pukekohe East Raod. i would like to know more details regarding this proposed change so that I can understand potential impact and be involved in decision making.

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

The reason for my or our views are:

We dont fully understand the impact it will have on our property as yet.

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

Please keep me involved in any decision making processes which may affect our property and lifestyle.

Submission date: 10 November 2023

Attend a hearing

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

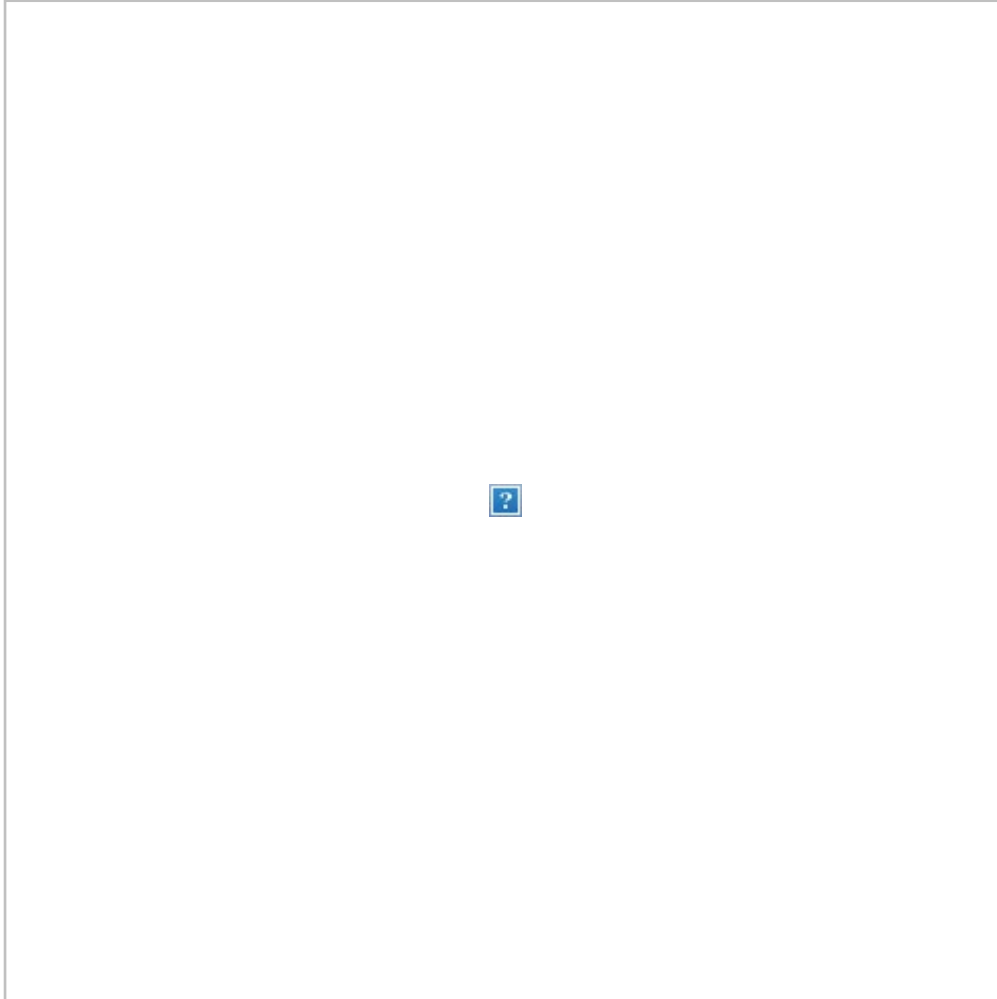
Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

I accept and agree that:

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

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



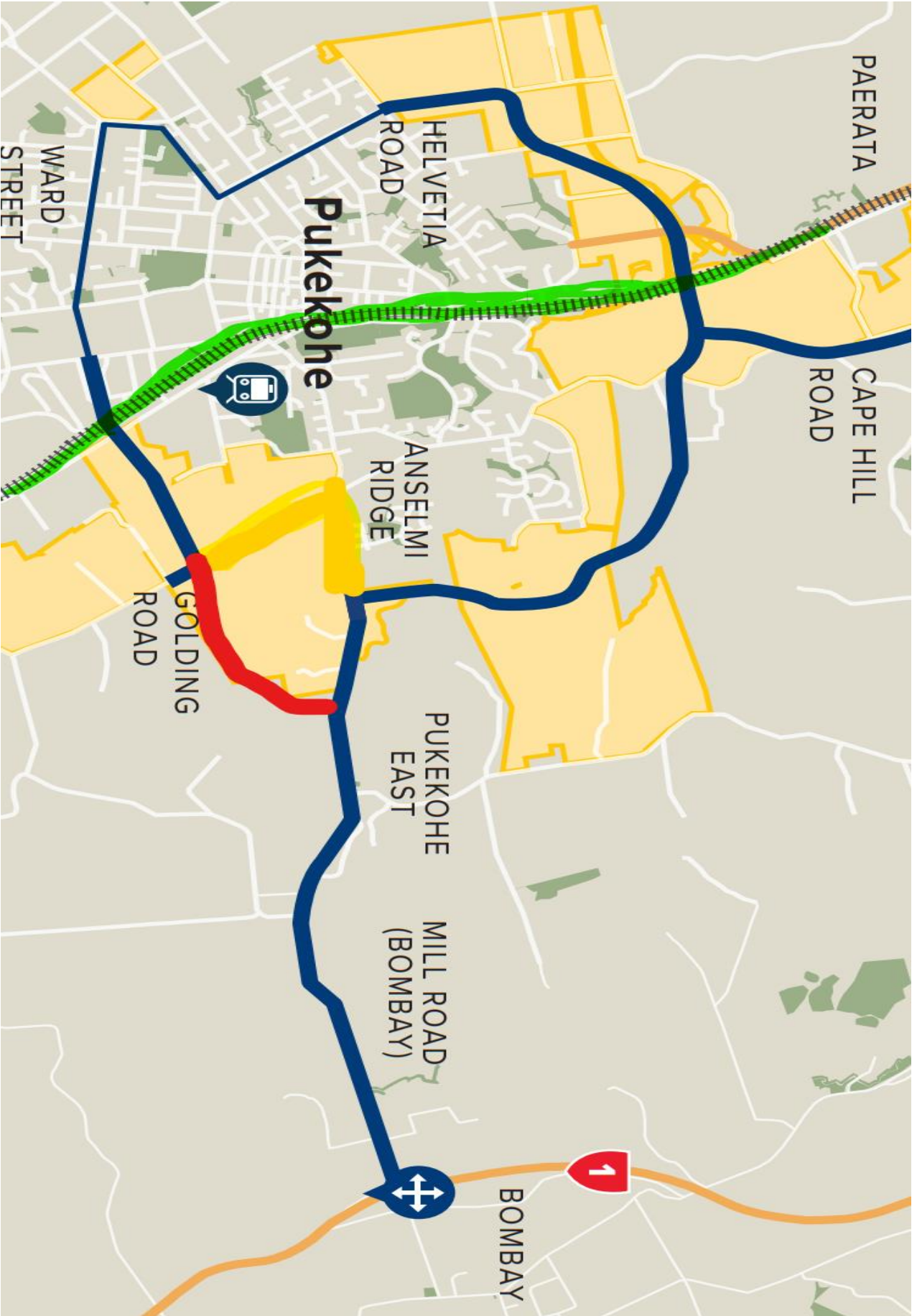
CAUTION: This email message and any attachments contain information that may be confidential and may be LEGALLY PRIVILEGED. If you are not the intended recipient, any use, disclosure or copying of this message or attachments is strictly prohibited. If you have received this email message in error please notify us immediately and erase all copies of the message and attachments. We do not accept responsibility for any viruses or similar carried with our email, or any effects our email may have on the recipient computer system or network. Any views expressed in this email may be those of the individual sender and may not necessarily reflect the views of Council.

Submission from Deirdre Twentyman (assisted by daughter/carer Janet Twentyman-Cato)

Resident at 100 Pukekohe East Road, Pukekohe

We strongly oppose the proposed Future Transport Network Plan affecting our location for the following reasons:

1. The current Future transport networks plan in terms of the use of Golding Road and on to Pukekohe East Rd as an expanded main arterial route, in particular for heavy transport due to the massive increased impact on the environment and carbon footprint for the area.
2. The land contour travelled by heavy transport to Bombay goes against all ESG initiatives that the country/world are actively working towards. The excessive carbon footprint and environmental impact is simply unnecessary. The only reason the vehicles go to Bombay is to enter the motorway to head north or south and this is something that could be accomplished by going from Pukekohe via Pokeno or Drury and given that routes easier contour it would create a load less environmental emission impact.
3. Although the front area roadside of our property is not land I personally own the widening of the road will unreasonably expose my home to extra and excessive noise, dust and vehicle emissions due to the proposed widening completely removing the large existing fencing and well-established trees and hedging.
4. My home is the home that is the closes to the road in our location and so the proposed road widening and development will create serious safety issues with vehicles coming unreasonably close to the front of our home and this will unreasonably reduce the enjoyment and usability of our front veranda and front yard of our property.
5. The current security and privacy of our property will be lost with the removal of the current fencing and established hedging, which will increase the dust and noise dramatically increasing the risk to my health particularly my hearing and breathing.
6. We currently struggle with road dust covering my house making it unsightly, this will increase tenfold with the removal of the front fence and established hedging.
7. The proposed barrier to be erected in the middle of the road will have an impact to my own carbon footprint and will dramatically increase due to us having to travel further to get access in and out of our property resulting in extra running costs.
8. The proposed changes will massively impact family and friends being able to visit and being able to safely enter and leave my property on a road that will clearly increase in traffic volume. As I am older having family and friends visiting is part of my mental health requirements as I cannot go very far these days. I feel these changes will impact this greatly.
9. Also, these changes will impact emergency services such as ambulance having safe access to the property. This is very concerning for someone my age.
10. I understand this is a future population growth area, but more thought needs to be done in the planning with genuine consideration given to trying to cut our emissions and impact on the environment. With this in mind, I would like to propose alternatives for your consideration (see map attached). **Option 1** = follow the current noise corridor of the railway lines (marked in **GREEN**) or **Option 2**, (less favoured due to the unnecessary route to Bombay) = cutting out Golding Rd and going around the future growth area (marked in **RED**).



From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:953] Notice of Requirement online submission - Rodney Cunningham
Date: Monday, 13 November 2023 1:16:06 pm

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

Contact details

Full name of submitter: Rodney Cunningham

Organisation name:

Full name of your agent: Rod Cunningham

Email address: rodunninghamnz@gmail.com

Contact phone number: +64226990744

Postal address:
399 Drury Hills Rd
Drury
Auckland 2577

Submission details

Name of requiring authority: Waka Kotahi NZ Transport Agency

The designation or alteration: Pukekohe : NOR 8 Mill Road and Pukekohe East Road Upgrade

The specific provisions that my submission relates to are:

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

The reason for my or our views are:

Negative impacts on our property 80 Mill Rd Bombay. Notable immediate impacts include but are not limited to: 1. access to the property - proposed left turn only impacts on access, stated extra length of travel time caused by needing to travel between new roundabouts of estimated 3-4 minutes does not include congestion time - experience of living in the area for 30 years (our family more than 100 years) shows regular congestion which will be exacerbated by changes hence the estimated extra travel time is grossly under estimated. This has negative impact on quality of life and value of the property. 2. increased noise impacts of increased traffic 3. increased dust impact from increased traffic 4. increased visual pollution impacts of increased traffic and road widening 5. increased exposure to walking and cycling traffic so causing larger risk of theft and property damage. 6. impact on animal and stock well being from increased traffic noise 7. increased vibration impact from increased traffic volumes and size of vehicles 8. impact on value of the property due to access being made much more difficult and removal of land from the title 9. the property water supply is located in the proposed NOR area so impacts the property 10. the walking and cycling paths are on the southern side of the roadway - this causes increased access issues for the property - we have not seen any proposals for how this will be dealt with so adequate access can be provided for our vehicles to get in and out of the driveway whilst contending with on coming vehicle traffic and well as walking and cycling traffic. 11. a median barrier is proposed in between opposing road lanes - this creates access issues 12. increased stormwater run off into our property

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

The shared path or walking and cycling path is located on the northern side of the roadway (currently shown as on the southern side of the roadway). This will allow better access for walking and cycling traffic as better links to current and future developed land and less need to cross Mill Road. Also better visibility when the road / paths meets the Tuff Ring (further to the west)- as I see the current proposal the walking/cycling path is on the southern side if it were to be on the northern side then those using the walking/cycling path will have excellent views into the Tuff Ring (if its on

the southern side then those views are much diminished). With the Tuff Ring being such an impressive visual feature it can be better utilised and exposed by a northern pathway, so many more people can enjoy the visual benefits and it can be made a destination pathway for tourism rather than just a walk/cycle access. Impacts on the Tuff Ring and construction will be minimal and aesthetic benefits much greater. That some form of "U Turning lane/access" is provided for vehicles effected by the left turn only property access - with the introduction of the two new roundabouts (Harrisville Rd and eastern end of Mill Rd by motorway interchange). That there is a traffic management system put in place that allows for free flowing 180 degree turns at the roundabouts (like dedicated lanes) so residents (and others) can more easily make the extra distance (and travel time potentially impacted by congestion) around the roundabouts so they can gain what would have been the right hand turn access into their properties.

Submission date: 13 November 2023

Attend a hearing

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

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

Declaration

I accept and agree that:

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

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

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

FORM 21



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 16, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only

Submission No:

Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

Mr Paul Reynolds

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

T A Reynolds Holdings Ltd.

Address for service of Submitter

3 Pukekohe East Rd

Pukekohe

Telephone:

272436221

Email:

admin @ reynoldsproduce.co.nz

Contact Person: (Name and designation if applicable)

This is a submission on a notice of requirement:

By:: Name of Requiring Authority

Waka Kotahi NZ Transport Agency

For: A new designation or alteration to an existing designation

Pukekohe NOR 8: Mill Road and Pukekohe East Road Upgrade

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

3 Pukekohe East Rd. Pukekohe. SG Reference 550344

Record of Title number. 955114

Taking land from front of 3 Pukekohe East Rd for future roundabout.

My submission is:

I or we support of the Notice of Requirement

I or we oppose to the Notice of Requirement

I or we are neutral to the Notice of Requirement

The reasons for my views are:

Reynolds Family have been on this site for 158 years growing packing and distributing fresh fruit and vegetables. Letter dated 23 August 2023 shows an attached map in blue criss cross a large section of our land being taken for future roundabout. This includes 2 entry exit points to our site. On the southern side of Pukekohe East Rd Council already own a parcel of land

approximately 100 metres x 60 metres.

(continue on a separate sheet if necessary)

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

Shift proposed roundabout south.

I wish to be heard in support of my submission

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

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

Paul Reynolds

Signature of Submitter

(or person authorised to sign on behalf of submitter)

11/23/2013

Date

Notes to person making submission:

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

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

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

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

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:958] Notice of Requirement online submission - Heritage New Zealand Pouhere Taonga
Date: Monday, 13 November 2023 4:46:10 pm
Attachments: [Pukekohe \(AC\) NOR 8 - HNZPT Submission - 13 Nov 2023.pdf](#)

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

Contact details

Full name of submitter: Heritage New Zealand Pouhere Taonga

Organisation name:

Full name of your agent: Alice Morris

Email address: amorris@heritage.org.nz

Contact phone number: 0276840833

Postal address:
PO Box 105-291

Auckland 1143

Submission details

Name of requiring authority: Waka Kotahi NZ Transport Agency

The designation or alteration: Pukekohe : NOR 8 Mill Road and Pukekohe East Road Upgrade

The specific provisions that my submission relates to are:

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

The reason for my or our views are:
Please refer to the attached submission - NoR 8(AC)

I or we seek the following recommendation or decision from Auckland Council:
Please refer to the attached submission - NoR 8(AC)

Submission date: 13 November 2023

Supporting documents
[Pukekohe \(AC\) NOR 8 - HNZPT Submission - 13 Nov 2023.pdf](#)

Attend a hearing

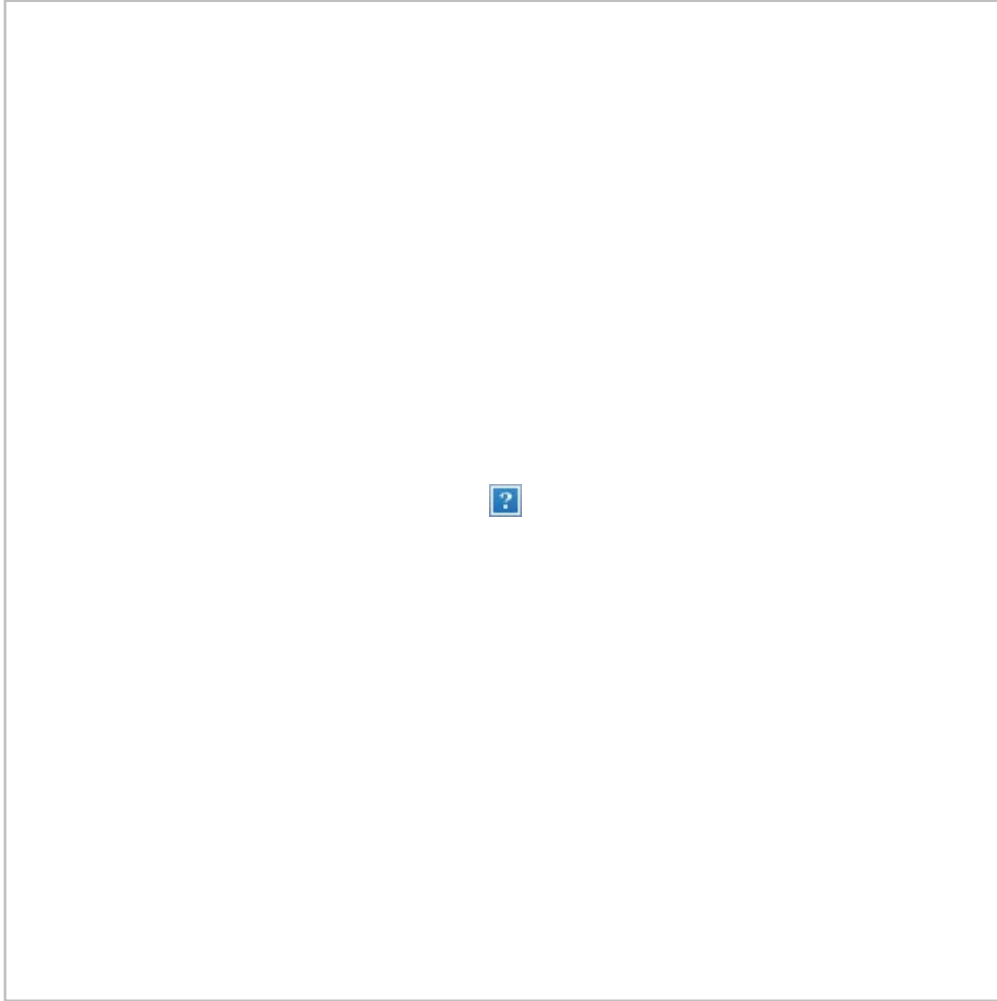
Do you wish to be heard in support of your submission? Yes

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

Declaration

I accept and agree that:

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



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13 November 2023

File ref: Pukekohe NoR 8 (AC)

Planning Technician, Auckland Council
unitaryplan@aucklandcouncil.govt.nz

Dear Sir/Madam

SUBMISSION ON THE NOTICE OF REQUIREMENT FOR THE PUKEKOHE TRANSPORT NETWORK - NOR 8 (AC) - MILL ROAD AND PUKEKOHE EAST ROAD UPGRADE, BY THE REQUIRING AUTHORITY: WAKA KOTAHĪ NZ TRANSPORT AGENCY

To: Auckland Council

Name of submitter: Heritage New Zealand Pouhere Taonga

1. Heritage New Zealand Pouhere Taonga (HNZPT) is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) for the identification, protection, preservation, and conservation of New Zealand's historical and cultural heritage. Heritage New Zealand is New Zealand's lead agency for heritage protection.
2. HNZPT could not gain an advantage in trade competition through this submission.
3. The focus for HNZPT is for the identification, protection, preservation, and conservation of historic heritage (HNZPTA) and advocate that historic heritage is fully considered in accordance with section 6(f) of the Resource Management Act 1991 (RMA).
4. The requirement for an Archaeological Authority to be obtained in accordance with the HNZPTA does not mitigate the effects of the NoR identified under the RMA. It is a separate statutory obligation before any physical works can be undertaken that may affect an archaeological site as defined under the HNZPTA. While obtaining an Archaeological Authority does not mitigate the effects on wider historic heritage values by the NoRs, it does ensure pre-1900 archaeological values associated with area of project works including unrecorded sites are fully assessed and formally documented through appropriate archaeological monitoring, investigation, and reporting. The Act does not however apply to buildings or structures that are post 1900 (unless they are declared under the HNZPTA) or to certain activities that may affect a pre-1900 building unless the building (or a pre-1900 component of) is to be demolished.
5. NoR 8 – Mill Road and Pukekohe East Road Upgrade, designates land within both Auckland and Waikato along Mill Road. HNZPT supports the purpose of planning for a well-functioning urban environment through the protection of integrated transport networks to support the expected future growth needs.



The specific parts of the Notice of Requirement that Heritage New Zealand’s submission relates to are:

6. HNZPT’s focus is to ensure the protection of historic heritage, and mitigation to manage any adverse effects resulting from the physical construction of the Network through the Outline Plan of Works process in the future.
7. HNZPT has reviewed the September 2023 ‘Pukekohe Transport Network Assessment of Effects on Historic Heritage’ prepared for the suite of NoRs for the Pukekohe Transport Network. In particular, the recommendations within this report for the preparation of a Historic Heritage Management Plan (‘HHMP’) before construction of NoR 8 commences, with reference to:
 - a. the recorded archaeological site known as the Bombay Flour Mill/Pilgrims Mill (NZAA R12/1208)¹, and
 - b. The possible pre-1900 villa at 188 Mill Road, and associated sub-surface remains that could be unearthed during construction²
8. HNZPT has also reviewed Te Tupa Ngatahi’s recommended wording of draft Condition 21 HHMP, in particular the reference to obtaining an Archaeological Authority under the HNZPTA in point 21(b)(iii), and the use of the term ‘unexpected’ in point (b)(IX)C.

Heritage New Zealand Pouhere Taonga supports the Notice of Requirement (NoR 8).

The reasons for Heritage New Zealand’s position are as follows:

9. The consideration, management, and mitigation of effects from the purpose of the designation on the historic heritage values of the place are required to ensure effects are appropriately mitigated.
10. The recommendations set out in September 2023 ‘Pukekohe Transport Network Assessment of Effects on Historic Heritage’ and the suite of conditions set out in the ‘Waka Kotahi Condition Set – Mill Road and Pukekohe East Road Upgrade’ are appropriate.
11. HNZPT is supportive of the intended mechanisms through a HHMP condition to ensure the protection of historic heritage, and mitigation to manage any adverse effects resulting from the physical construction of the Network through the Outline Plan of Works process in the future.

Heritage New Zealand seeks the following decision from Council:

12. The approval of NoR 8 (AC) - Mill Road and Pukekohe East Road Upgrade.

Heritage New Zealand wishes to be heard in support of their submission.

¹ Assessment of Effects on Historic Heritage, paragraphs 5.3.4 and 5.3.5

² Assessment of Effects on Historic Heritage, paragraph 5.2.3



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

Yours sincerely

BHParslow

Director Northern Region

Address for service: Alice Morris
amorris@heritage.org.nz
PO Box 105 291
Auckland City 1143

Cc: Waka Kotahi NZ Transport Agency submissions@supportinggrowth.nz

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:959] Notice of Requirement online submission - Heritage New Zealand Pouhere Taonga
Date: Monday, 13 November 2023 4:46:11 pm
Attachments: [Pukekohe \(WD\) NOR 8 - HNZPT Submission - 13 Nov 2023.pdf](#)

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

Contact details

Full name of submitter: Heritage New Zealand Pouhere Taonga

Organisation name:

Full name of your agent: Alice Morris

Email address: amorris@heritage.org.nz

Contact phone number: 0276840833

Postal address:
PO Box 105-291

Auckland 1143

Submission details

Name of requiring authority: Waka Kotahi NZ Transport Agency

The designation or alteration: Pukekohe : NOR 8 Mill Road and Pukekohe East Road Upgrade

The specific provisions that my submission relates to are:

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

The reason for my or our views are:
Please refer to the attached submission - NoR 8(WD)

I or we seek the following recommendation or decision from Auckland Council:
Please refer to the attached submission - NoR 8(WD)

Submission date: 13 November 2023

Supporting documents
[Pukekohe \(WD\) NOR 8 - HNZPT Submission - 13 Nov 2023.pdf](#)

Attend a hearing

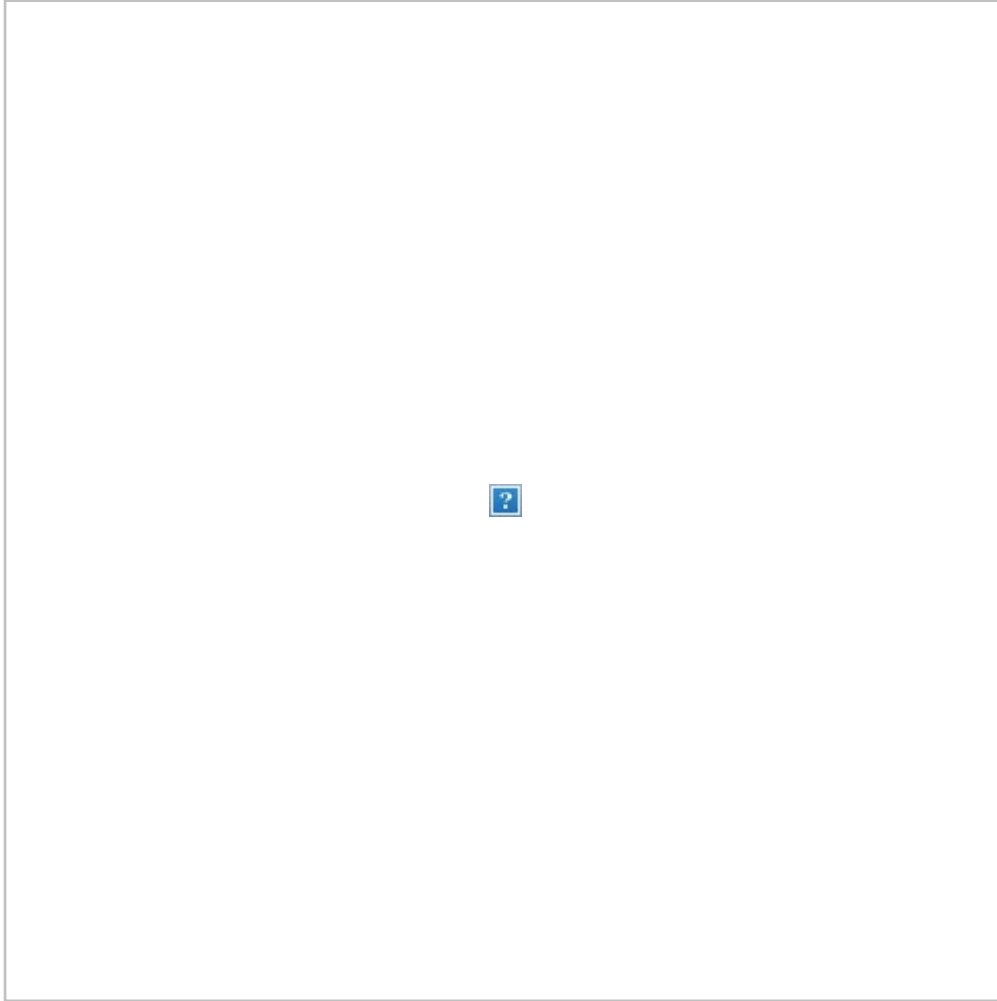
Do you wish to be heard in support of your submission? Yes

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

Declaration

I accept and agree that:

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



CAUTION: This email message and any attachments contain information that may be confidential and may be LEGALLY PRIVILEGED. If you are not the intended recipient, any use, disclosure or copying of this message or attachments is strictly prohibited. If you have received this email message in error please notify us immediately and erase all copies of the message and attachments. We do not accept responsibility for any viruses or similar carried with our email, or any effects our email may have on the recipient computer system or network. Any views expressed in this email may be those of the individual sender and may not necessarily reflect the views of Council.



13 November 2023

File ref: Pukekohe NoR 8 (WD)

Waikato District Council
Online Submission Form

Dear Sir/Madam

SUBMISSION ON THE NOTICE OF REQUIREMENT FOR THE PUKEKOHE TRANSPORT NETWORK - NOR 8 (WD) - MILL ROAD AND PUKEKOHE EAST ROAD UPGRADE (DES0006/24), BY THE REQUIRING AUTHORITY: WAKA KOTAHI NZ TRANSPORT AGENCY

To: Waikato District Council

Name of submitter: Heritage New Zealand Pouhere Taonga

1. Heritage New Zealand Pouhere Taonga (HNZPT) is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) for the identification, protection, preservation, and conservation of New Zealand's historical and cultural heritage. Heritage New Zealand is New Zealand's lead agency for heritage protection.
2. HNZPT could not gain an advantage in trade competition through this submission.
3. The focus for HNZPT is for the identification, protection, preservation, and conservation of historic heritage (HNZPTA) and advocate that historic heritage is fully considered in accordance with section 6(f) of the Resource Management Act 1991 (RMA).
4. The requirement for an Archaeological Authority to be obtained in accordance with the HNZPTA does not mitigate the effects of the NoR identified under the RMA. It is a separate statutory obligation before any physical works can be undertaken that may affect an archaeological site as defined under the HNZPTA. While obtaining an Archaeological Authority does not mitigate the effects on wider historic heritage values by the NoRs, it does ensure pre-1900 archaeological values associated with area of project works including unrecorded sites are fully assessed and formally documented through appropriate archaeological monitoring, investigation, and reporting. The Act does not however apply to buildings or structures that are post 1900 (unless they are declared under the HNZPTA) or to certain activities that may affect a pre-1900 building unless the building (or a pre-1900 component of) is to be demolished.
5. NoR 8 – Mill Road and Pukekohe East Road Upgrade, designates land within both Auckland and Waikato along Mill Road. HNZPT supports the purpose of planning for a well-functioning urban environment through the protection of integrated transport networks to support the expected future growth needs.



The specific parts of the Notice of Requirement that Heritage New Zealand’s submission relates to are:

6. HNZPT’s focus is to ensure the protection of historic heritage, and mitigation to manage any adverse effects resulting from the physical construction of the Network through the Outline Plan of Works process in the future.
7. HNZPT has reviewed the September 2023 ‘Pukekohe Transport Network Assessment of Effects on Historic Heritage’ prepared for the suite of NoRs for the Pukekohe Transport Network. In particular, noting the reference to the recorded archaeological site known as the Bombay Flour Mill/Pilgrims Mill (NZAA R12/1208).¹, and the recommendations within this report for the preparation of a Historic Heritage Management Plan (‘HHMP’) before construction of NoR 8 commences.
8. HNZPT has also reviewed Te Tupa Ngatahi’s recommended wording of draft Condition 21 HHMP, in particular the reference to obtaining an Archaeological Authority under the HNZPTA in point 21(b)(iii), and the use of the term ‘unexpected’ in point (b)(IX)C.

Heritage New Zealand Pouhere Taonga supports the Notice of Requirement (NoR 8).

The reasons for Heritage New Zealand’s position are as follows:

9. The consideration, management, and mitigation of effects from the purpose of the designation on the historic heritage values of the place are required to ensure effects are appropriately mitigated.
10. The recommendations set out in September 2023 ‘Pukekohe Transport Network Assessment of Effects on Historic Heritage’ and the suite of conditions set out in the ‘Waka Kotahi Condition Set – Mill Road and Pukekohe East Road Upgrade’ are appropriate.
11. HNZPT is supportive of the intended mechanisms through a HHMP condition to ensure the protection of historic heritage, and mitigation to manage any adverse effects resulting from the physical construction of the Network through the Outline Plan of Works process in the future.

Heritage New Zealand seeks the following decision from Council:

12. The approval of NoR 8 (WD) - Mill Road and Pukekohe East Road Upgrade (DES0006/24).

Heritage New Zealand wishes to be heard in support of their submission.

¹ Assessment of Effects on Historic Heritage, paragraphs 5.3.4 and 5.3.5



HERITAGE NEW ZEALAND
POUHERE TAONGA

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

Yours sincerely

BHParslow

Director Northern Region

Address for service: Alice Morris
amorris@heritage.org.nz
PO Box 105 291
Auckland City 1143

Cc: Waka Kotahi NZ Transport Agency, submissions@supportinggrowth.nz

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

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



FORM 21

Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 16, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

~~Mr/Mrs/Miss/Ms~~(Full Name) Pamela Unkovich

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

Firstgas Ltd

Address for service of Submitter

Private Bag 2020, New Plymouth 4340

Telephone:

027 237 0944

Email:

pam.unkovich@firstgas.co.nz

Contact Person: (Name and designation if applicable)

Pamela Unkovich, Senior Land and Planning Advisor

This is a submission on a notice of requirement:

By:: Name of Requiring Authority

Waka Kotahi NZ Transport Agency

For: A new designation or alteration to an existing designation

Pukekohe NOR 8: Mill Road and Pukekohe East Road Upgrade

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

See attached submission

My submission is:

I or we support of the Notice of Requirement

I or we oppose to the Notice of Requirement

I or we are neutral to the Notice of Requirement

The reasons for my views are:

See attached submission

(continue on a separate sheet if necessary)

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

see attached submission

I wish to be heard in support of my submission

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

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



11/13/2023

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

Date

Notes to person making submission:

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

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

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

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

First Gas Limited
 42 Connett Road, Bell Block
 Private Bag 2020, New Plymouth, 4340
 New Zealand
 P +64 6 755 0861
 F +64 6 759 6509

13 November 2023

Auckland Council
 C/O Joe McDougall
 Planning South – Plans and Places
 Via email: unitaryplan@aucklandcouncil.govt.nz

Tēnā Koe

Notice of Requirement (NoR) – Pukekohe: Mill Road & Pukekohe East Road Upgrade (Waka Kotahi NZTA) – NoR 8

Thank you for the opportunity to make a submission on the Notice of Requirement for an upgrade of Mill Road (Bombay) in east for additional vehicle lanes and a shared path and an upgrade of Pukekohe East Road, Pukekohe in the west for a shared path.

1. Background

Firstgas owns and operates approximately 2500km of high-pressure natural gas transmission pipelines throughout the North Island and is also a Requiring Authority under the Resource Management Act 1991 ('RMA'). Firstgas' ownership includes the ancillary above and below ground infrastructure required to operate the gas network. Collectively this system is known as the Gas Transmission Network.

In addition to the Gas Transmission Network, Firstgas also operates more than 4,800kms of gas distribution networks across the North Island,

Within the NoR area for the additional vehicle lanes and shared paths, Firstgas owns and operates the 200 and the 400B transmission lines, the main transmissions lines supply Auckland and Northland. These pipelines are critical for consistent provision of energy to numerous businesses, industries, community services such as hospitals, and residences.

Firstgas' assets in the area are illustrated in **Figure 1-1** below and included as Appendix 1 to this submission.



Figure 1-1: Firstgas Ltd pipelines and above-ground assets in the area subject to the NoR

firstgas.co.nz

Firstgas' gas network is regionally and nationally significant infrastructure in that it delivers significant benefits to people and communities social and economic well-being, as well as providing for their health and safety.

Firstgas is required to ensure the protection and integrity of the pipeline is maintained to ensure the safety of the public, property and the environment. Pipelines are required to meet the safety and operational requirements of the Health and Safety in Employment (Pipelines) Regulations 1999 and the operating code Standard AS2885 Pipelines – Gas and Liquid Petroleum (AS2885).

Third party interference is one of the main risks to the safety and integrity of the underground pipelines. Activities which may affect the Gas Transmission Network need to take into account the location and protection requirements of the pipelines and other infrastructure. Activities in the vicinity of the Gas Transmission Network need to be carried out in a way which does not compromise the safe and efficient operation of the network, including the ability to legally and physically access the network with the necessary machinery to undertake works.

Additionally, changes to pipelines, particularly the main transmission lines, requires careful management and planning due to the safety, economic and environmental considerations required for planning and execution of any realignment, upgrading or recoating.

We note that the NoR proposes construction works over the existing pipelines, including potential additional lanes and/or shared pathway. We raise concerns that the lodged plans do not provide clear indication of pipeline locations on the southern side of Mill Road within either Sheet 1 or Sheet 2 of the *General Arrangement Layout Plan*, as lodged with Auckland Council, see Figures 1-2 and 1-3 below.

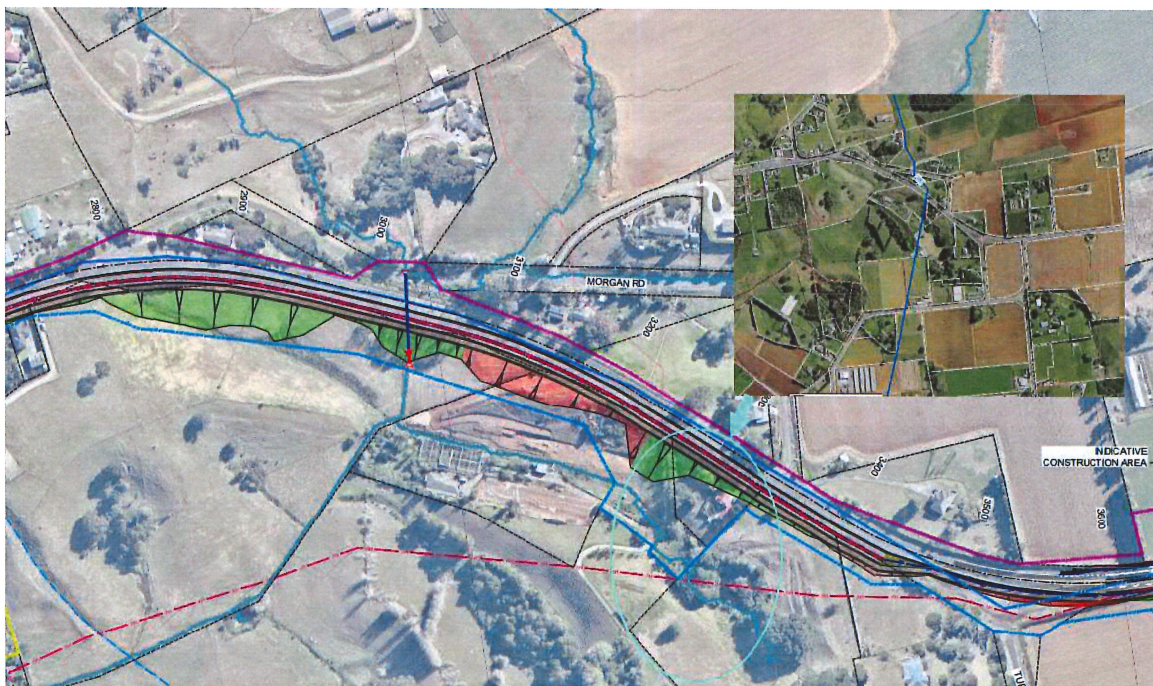


Figure 1-2: Snip from Sheet 1 of 2 *General Arrangement Layout Plan* with insert showing location of 200 pipeline not shown on plan.

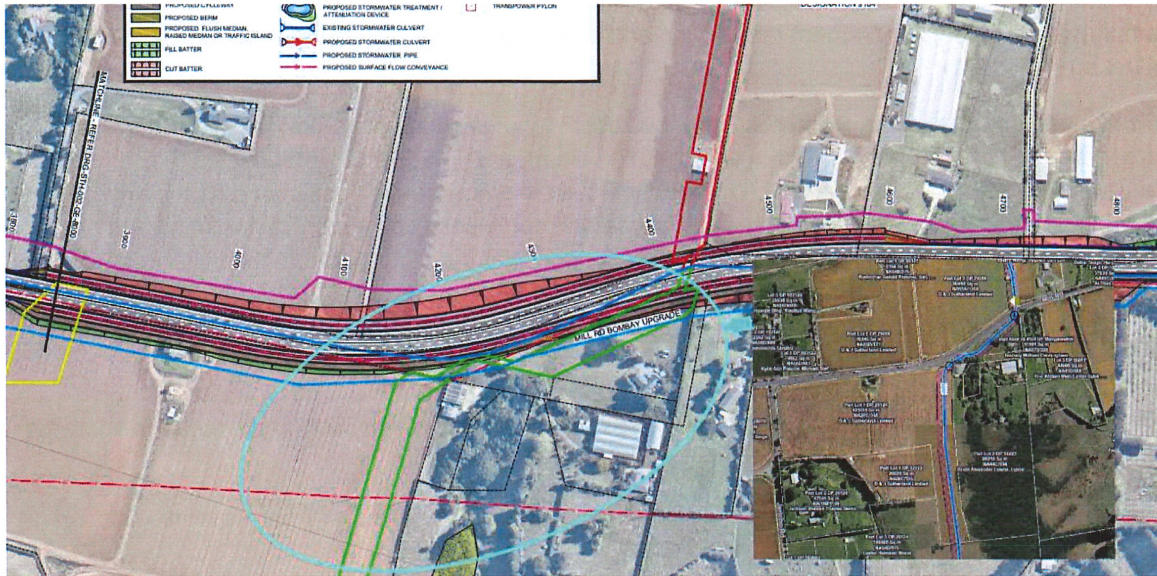


Figure 1-3: Snip from Sheet 2 of 2 *General Arrangement Layout Plan* with insert showing location of 200 pipeline not shown on plan although the Designation area is shown.

We note that the Assessment of Environmental Effects (AEE) lodged with the application acknowledges that the project intersects with the First Gas designation 9104 – Pukekohe to East Tamaki Gas Pipeline and lists First Gas as a stakeholder in respect of ongoing Infrastructure Interface meetings. We note that the AEE is silent on the intersection of the project with the 200-transmission pipeline. Our concerns on the lack of visibility of the transmission pipelines on plans, even at this early planning stage, poses risks in advancement of engineering designs without due consideration of the safety requirements of the pipelines. This is demonstrated by the indicative placement of fill batter on the pipeline, which poses safety risks for safe pipeline operations.

Condition 5 of the conditions proposed for the NoR relates to Network Utility Operators (Section 176 Approval), stating –

(a) Prior to the start of Construction Works, Network Utility Operators with existing infrastructure located within the designation will not require written consent under section 176 of the RMA for the following activities:

- (i) operation, maintenance and urgent repair works;*
- (ii) minor renewal works to existing network utilities necessary for the on-going provision or security of supply of network utility operations;*
- (iii) minor works such as new service connections; and*
- (iv) the upgrade and replacement of existing network utilities in the same location with the same or similar effects as the existing utility.*

(b) To the extent that a record of written approval is required for the activities listed above, this condition shall constitute written approval.

It is unclear if (b) provides for the condition to act as written approval post-construction, or if Condition 5, in its entirety, is limited to only the period prior to start of Construction Works.

Condition 10 of the conditions proposed for the NoR, requires the preparation of an Urban and Landscape Design Management Plan (ULDMP). While there is invitation for 'key stakeholders identified through Condition 8(b)(i) to participate in the development at least six (6) months prior to the start of detailed design for a Stage of Work, we consider that specific reference to a requirement to consult closely with Network Utility Operators as part of the ULDMP process, is necessary to

emphasis the safety requirement for planting and landscaping around gas transmission pipelines. planting.

Realignment of pipelines and ancillary structures/components, is a major undertaking for the organisation, requiring a long lead-in and planning timeframe. Firstgas Ltd appreciates the engagement with Waka Kotahi NZTA through the current processes but has concerns that the project has the potential to impact negatively upon a safe and continuous gas supply to Auckland and Northland consumers through designs that may not consider the pipelines from the initial concept.

2. Relief Sought

Firstgas Ltd seek that Sheets 1 and 2 of the lodged plan, *General Arrangement Layout Plan* show the gas pipelines along the entire locale where the project intersects with them.

Firstgas Ltd seek that Condition 5 (b) specifically constitutes written approval for the works listed in (a) (i) – (iv) post-construction.


Firstgas Ltd seek that Condition 10 includes specific requirement for consultation with Network Utility Operators in the design and preparation, and any subsequent establishment and/or maintenance works associated with the ULDMP.

2. Summary

Firstgas Ltd takes a neutral stance in respect of the merits, or otherwise, of the NoR, with our submission foci seeking that the pipeline safety and ongoing operation and provision surety of supply for consumers be foremost in the project design and construction.

Please feel free to contact me should you wish to discuss this submission further. Firstgas Ltd would welcome an opportunity to speak further to this submission, should this be made available.

Yours faithfully



Pamela (Pam) Unkovich
Senior Land and Planning Advisor
Mob 027 237 0944

Appendix 1: Aerial of First Gas Transmission Pipelines in NoR 8 area



Scale: 1:4,514
 Date of Issue: 13/11/2023

Firstgas Transmission Pipelines NoR 8

DISCLAIMER:
 This map is provided for information purposes only. Whilst care has been taken in the preparation of this map, Firstgas Limited accepts no liability for the accuracy and completeness of this map and make no representation or warranty, express or implied to the same. Copyright of this map is vested in Firstgas Limited. The content may not be reproduced, either in whole or in part, by any means whatsoever without the prior written consent of Firstgas Limited.
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Prior to commencing work, please contact First Gas on 0800 800 393 or email locations@firstgas.co.nz for free on site locations and permits. A minimum of two working days notice is required.

Submission on Eight Notices of Requirement for the Pukekohe Package lodged by Waka Kotahi NZ Transport Agency and Auckland Transport as requiring authorities under the Resource Management Act 1991

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

SUBMISSION ON: Notices of Requirement ("**NoRs**") for the Pukekohe Package and Local Arterials

FROM: Watercare Services Limited ("**Watercare**")

ADDRESS FOR SERVICE: Mark Bishop
Regulatory & Policy Manager
Watercare Services Ltd
Private Bag 92 521
Wellesley Street
AUCKLAND 1141
Phone: 022 010 6301
Email: Mark.Bishop@water.co.nz

DATE: 13 November 2023

1. INTRODUCTION

- 1.1 Watercare is pleased to have the opportunity to make a submission on the eight NoRs for the Pukekohe and Local Networks lodged by Waka Kotahi NZ Transport Agency ("**Waka Kotahi**") and Auckland Transport as requiring authorities under the Resource Management Act 1991 ("**RMA**") in Auckland.
- 1.2 Watercare neither supports nor opposes the NoRs (ie it is neutral as to whether the NoRs are confirmed or not). Watercare seeks to ensure that any decisions made to confirm the NoRs responds to the issues raised in this submission and avoids, remedies or mitigates potential adverse effects on Watercare's ability to provide water and wastewater services now and in the future. Watercare is interested in all of the eight NoRs.
- 1.3 Watercare could not gain an advantage in trade competition through this submission.

2. WATERCARE – OUR PURPOSE AND MISSION

- 2.1 Watercare is New Zealand's largest provider of water and wastewater services. We are a substantive council-controlled organisation under the Local Government Act 2002 ("**LGA**") and are wholly owned by Auckland Council ("**Council**"). Watercare has a significant role in helping Auckland Council achieve its vision for the city. Our services are vital for life, keep people safe and help communities to flourish.
- 2.2 Watercare provides integrated water and wastewater services to approximately 1.7 million people in the Auckland region. Over the next 30 years, this could increase by another 720,000 people, potentially requiring another 313,000 dwellings along with associated water and wastewater infrastructure. The rate and speed of Auckland's population growth puts pressure on our communities, our environment, and our housing and infrastructure networks. It also means increasing demand for space, infrastructure, and services necessary to support this level of growth.
- 2.3 Under both the LGA and the Local Government (Auckland Council) Act 2009, Watercare has certain obligations. For example, Watercare must achieve its shareholder's objectives as specified in our statement of intent, be a good employer, and exhibit a sense of social and environmental responsibility.¹
- 2.4 Watercare must also give effect to relevant aspects of the Council's Long-Term Plan, and act consistently with other plans and strategies of the Council, including the Auckland Unitary Plan (Operative in Part) and the Auckland Future Development Strategy.
- 2.5 Watercare is also required to manage our operations efficiently with a view to keeping overall costs of water supply and wastewater services to our customers (collectively) at minimum levels, consistent with effective conduct of the undertakings and maintenance of long-term integrity of our assets.²

3. PLANNED AND EXISTING WATERCARE ASSETS

- 3.1 Some of the NoRs interact with existing Watercare water and wastewater assets. The Assessment of Effects on the Environment for the NoRs states that Watercare assets are within the project areas for NoR 1,2 and 5-8.³
- 3.2 Some of the project areas for the NoRs are within areas where Watercare has planned for future infrastructure development. Water and wastewater infrastructure to be developed within the areas covered by the NoRs broadly falls in two categories; developer-led infrastructure to service growth at a local network level, and Watercare-led infrastructure to service growth at a bulk level.
- 3.3 Watercare may have some awareness of developer-led infrastructure projects within the covered areas, but it is important to clarify that Watercare is not responsible for and does not have direct control over these projects until they are finished and officially vested. It is also worth noting that Watercare has limited insight into the details of developer-led infrastructure projects, however as previously noted, wishes to remain involved in future engagement to ensure alignment between infrastructure providers.

¹ LGA, s 59.

² Local Government (Auckland Council) Act 2009, s 57.

³ Assessment of Effects on the Environment for the NoRs (dated September 2023) at Table 11-7.

3.4 Specific commentary regarding known projects within Watercare's Asset Management Plan to service growth at a bulk level is outlined below. Solutions and alignments/locations are subject to change as we learn more, progress our projects and the area develops. There is also potential for new needs to surface, necessitating further bulk infrastructure. Ongoing engagement is critical to maintain alignment.

(a) **NoR Pukekohe: Drury West Arterial⁴ ("NoR 1") (Auckland Transport)**

- The current concept for Watercare's Wesley/Paerata Watermain has it travelling west along Karaka Rd from Runciman Rd. The alignment is yet to be finalised but there is a high likelihood it will intersect with NoR 1.

(b) **NoR Pukekohe: Drury – Pukekohe Link⁵ ("NoR 2") (Waka Kotahi)**

- The current concept for Watercare's Wesley/Paerata Watermain has it travelling west along Karaka Rd from Runciman Rd. The alignment is yet to be finalised but there is a high likelihood it will intersect with NoR 2.
- Watercare plans to install a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd however this is yet to be finalised so there is potential for it to intersect with NoR 2.

(c) **NoR Pukekohe: Paerata Connections⁶ ("NoR 3") (Auckland Transport)**

- Watercare plans to install a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd and while it is yet to be finalised, there is high likelihood it will intersect with NoR 3.

(d) **NoR Pukekohe: Pukekohe North-East Arterial⁷ ("NoR 4") (Auckland Transport)**

- Watercare plans to install a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd and while it is yet to be finalised, there is high likelihood it will intersect with NoR 4.

(e) **NoR Pukekohe: Pukekohe South-East Arterial⁸ ("NoR 5") (Auckland Transport)**

⁴ A new transport corridor with active mode facilities in Drury West, extending south from the intersection of State Highway 22 and Jesmond Road to the edge of the Future Urban Zone near Runciman Road, Drury

⁵ A new state highway including a shared path from Great South Road, Drury in the northeast, connecting State Highway 22 in the west, and the area in the vicinity of Sim Road/Cape Hill Road, Pukekohe in the south.

⁶ Two new transport corridors including active mode facilities. One between the two extents of Sim Road, Paerata across the North Island Main Trunk Rail Line. The second between Paerata Rail Station and Sim Road, Paerata.

⁷ A new transport corridor including active mode facilities between State Highway 22, Paerata on the north west and Pukekohe East Road, Pukekohe in the south east.

⁸ Upgrade part of Pukekohe East Road and Golding Road, and a new connection from Golding Road to Svendsen Road, Pukekohe across Station Road and the North Island Main Trunk Rail Line - including active mode facilities.

- Watercare is working through detailed design of a new Bulk Supply Point (Pukekohe East BSP) at 88 Pukekohe Rd, which is within NoR 5.
 - Watercare plans to install a new wastewater rising main, which would run south down Station Rd before heading west under the NIMT and along Svendsen Rd. Parts of this will fall within NoR 5.
- (f) **NoR Pukekohe: Pukekohe South-West Upgrade⁹ ("NoR 6") (Auckland Transport)**
- The current concept for Watercare's Waikato 2 Watermain has it travelling north up Queen St before heading west and northwest along Harris St and Helvetia Rd. Work is planned to commence shortly to identify the preferred route and work through a NoR process for the watermain. There is a likelihood it will fall within NoR 6.
- (g) **NoR Pukekohe: Pukekohe North-West Upgrade¹⁰ ("NoR 7") (Auckland Transport)**
- Watercare is installing a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd however this is yet to be finalised so there is potential for it to intersect with NoR 7.
 - The current concept for Watercare's Waikato 2 Watermain has it travelling north up Queen St before heading west and northwest along Harris St and Helvetia Rd. Work is planned to commence shortly to identify the preferred route and work through a NoR process for the watermain. There is a likelihood it will fall within NoR 7.
- (h) **NoR Pukekohe: Mill Road and Pukekohe East Road Upgrade¹¹ (NoR 8) (Waka Kotahi)**
- Watercare has no planned projects at this time that intersect with NoR 8, although may have future developments where requirements change due to growth.

4. SUBMISSION POINTS AND RELIEF SOUGHT

- 4.1 This is a submission on the eight NoRs (summarised above) that were lodged on 2 October 2023 and publicly notified on 13 October 2023.
- 4.2 As noted previously, Watercare neither supports or opposes these NoRs (ie it is neutral as to whether the NoRs are confirmed or not). Watercare seeks to ensure that any decisions made on the NoRs responds to the issues raised in this submission and avoids, remedies,

⁹ Upgrade specific intersections and regrade specific driveways on Nelson Street, Ward Street, West Street and Helvetia Road for active mode facilities.

¹⁰ Upgrade Helvetia Road, Pukekohe in the south-west and a new corridor from Helvetia Road to SH22 Paerata in the north-east including active mode facilities.

¹¹ Upgrade of Mill Road (Bombay) in the east for additional vehicle lanes and a shared path and an upgrade of Pukekohe East Road, Pukekohe in the west for a shared path.

or mitigates potential adverse effects on Watercare's ability to provide water and wastewater services now and in the future.

Early engagement

- 4.3 Watercare seeks to ensure that there is a live and continual process planned forward to recognise that asset management and construction plans are constantly updating and changing.
- 4.4 Watercare acknowledges the proactive approach to engagement shown by the requiring authorities to date. Watercare has been in discussions with the Supporting Growth Alliance, and has had discussions through the preceding 'future urban land use strategy' project work. Watercare has also had independent engagement with Waka Kotahi and Auckland Transport during the development of these NoR's.
- 4.5 Watercare supports in depth collaboration and consultation (including information, data sharing and identification of opportunistic works) across infrastructure providers on the development (or redevelopment) of urban environments and wishes to ensure that there is ongoing and timely engagement and collaboration as the projects develop.
- 4.6 As noted, Watercare seeks early engagement from the requiring authorities for future planning and construction works including engagement prior to detailed design and during implementation of construction works. Early and fulsome engagement with Watercare, along with other infrastructure providers, can enable opportunities to plan and future proof the delivery of assets to provide for well-functioning urban environments. For Watercare, this includes applying for, in a timely manner, "Works Over" Approvals, in compliance with Watercare's "Water Supply and Wastewater Network Bylaw 2015" (updated 2021).
- 4.7 In addition, the NoRs interact with existing water and wastewater services. Watercare seeks to ensure the NoRs do not impact its wastewater and water services in the NoR project areas now and into the future (these assets, and planned projects are detailed in paragraph [3.4] above). Watercare wishes to ensure it maintains access to its assets 24 hours a day, 7 days a week for maintenance, safety and efficient operation of its services and that it is consulted on any works undertaken by the requiring authorities that may impact Watercare's services.

Specific amendments to conditions

- 4.8 Watercare has filed evidence, and attended, recent NoR hearings for other Supporting Growth Alliance projects (the North West Strategic Network, and the Airport to Botany Bus Rapid Transit Project). The conditions proposed for the NoRs by the requiring authorities for these NoRs are similar to those which have been proposed at the recent North West Strategic Network hearing (in rebuttal evidence).
- 4.9 Watercare supports the intention of conditions proposed by the requiring authorities which seek to ensure that there is engagement with relevant stakeholders during the development of the eight NoRs (ie the conditions which require a Network Utility Management Plan ("**NUMP**"), Stakeholders Communication and Engagement Management Plan ("**SCEMP**"), and Land use Integration Process ("**LIP**")).
- 4.10 That said, Watercare considers further amendments to the conditions are required to address matters raised in this submission, so that the conditions for the eight NoRs

adequately provide for engagement with network utilities, in particular during the feasibility and detailed design stage.

- 4.11 Watercare seeks that a new condition requiring the preparation of a "Network Utility Strategic Outcomes Plan" be added to all eight NoRs to futureproof assets in consultation with network utility operators such as Watercare:

Network Utility Strategic Outcomes Plan (NUSOP)

- (a) A NUSOP shall be prepared in the project feasibility stage or as early as practicable.
- (b) The objective of the NUSOP is to set out a strategic framework for asset resilience that includes consideration of growth, corridor protection, and asset renewals over time.
- (c) The NUSOP shall:
 - i. consider expected asset life of existing assets;
 - ii. consider expected asset capacity increases or changes; and
 - iii. demonstrate how city and national strategic plans are considered.
- (d) The NUSOP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project, including Watercare.
- (e) The NUSOP shall describe how strategic plans from the Network Utility Operators in relation to its assets have been addressed.
- (f) Any comments received from the Network Utility Operator shall be considered when finalising the NUSOP.
- (g) Any amendments to the NUSOP related to the assets of a Network Utility Operator shall be prepared in consultation with that asset owner.

- 4.12 If the above condition is not included in the NoRs, Watercare seeks the following amendments (shown in underline) to the NUMP condition for all eight of the NoRs:

- (a) A NUMP shall be prepared after consultation with Network Utility Operator(s) including during the feasibility and detailed design phases, and prior to the lodgement of an Outline Plan of Works for a stage of construction Start of Construction for a Stage of Work.
- ...
- (c) The NUMP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project and shall include any s177 consents required for works affecting prior Designations and Watercare 'Works Over Approvals'.
- ...
- (h) The Requiring Authority shall consult with Network Utility Operators during the feasibility and detailed design phases to identify opportunities to enable, or not preclude, the development of new network utility facilities including access to power, water services and ducting within the Project, where practicable to do so. The consultation undertaken, opportunities considered, and whether or not they

have been incorporated into the detailed design, shall be summarised in the Outline Plan or Plans prepared for the Project.

- 4.13 Watercare also seeks that the LIP condition is included in all of the NoRs (including the NoRs lodged by Waka Kotahi), as opposed to only being included in the Auckland Transport NoRs as is currently proposed.

5. RECOMMENDATION SOUGHT

- 5.1 Watercare seeks that Auckland Council recommends:

- (a) amendments to the conditions of the NoRs, as set out above in its submission (and any other conditions), to ensure any adverse effects on Watercare's assets and operations are avoided, remedied or mitigated and to address the concerns set out above; and
- (b) such further other relief or other consequential amendments as considered appropriate and necessary to address the concerns set out above.

- 5.2 Watercare wishes to be heard in support of this submission.

- 5.3 If others make a similar submission, consideration would be given to presenting a joint case with them at any hearing.



Steve Webster
Chief Infrastructure Officer
Watercare Services Limited

Form 21

Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification under Section 168A, 169, 181, 189A, 190 and 195A of the Resource Management Act 1991

Date: 13 November 2023

To: Te Tupu Ngātahi – Supporting Growth Alliance

Name of Submitter: Te Tāhuhu o te Mātauranga | Ministry of Education

Address for Service: Woods
8 Nugent Street
Grafton, Auckland

Attention: Emma Howie, General Manager – Planning & Urban Design

Phone: 027 572 2220

Email: emma.howie@woods.co.nz

Submission on eight Notices of Requirement for Te Tupu Ngātahi Supporting Growth for the Pukekohe Transport Network

SUMMARY

- 1) The Ministry of Education (“**the Ministry**”) is the Government’s lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government’s goals for education.
- 2) Te Tupu Ngātahi Supporting Growth Alliance (“**Te Tupu Ngātahi**”) has lodged eight Notices of Requirement (“**NoR**”) for the Pukekohe within the Pukekohe, Paerata and Drury West areas:
 - NoR 1 – Pukekohe: Drury West Arterial
 - NoR 2 – Pukekohe: Drury – Pukekohe Link
 - NoR 3 – Pukekohe: Paerata Connections
 - NoR 4 - Pukekohe: Pukekohe North-East Arterial
 - NoR 5 - Pukekohe: Pukekohe South-East Arterial
 - NoR 6 - Pukekohe: Pukekohe South-West Upgrade
 - NoR 7 - Pukekohe: Pukekohe North-West Upgrade
 - NoR 8 - Pukekohe: Mill Road and Pukekohe East Road Upgrade
- 3) This submission relates to all eight NoRs lodged by Te Tupu Ngātahi.
- 4) There are a number of existing schools in proximity to the NoRs. There is potential for these schools, or any future schools developed in this area, to be affected by traffic, noise and other nuisance effects arising from future construction works of this transportation network. The Ministry is seeking to ensure that appropriate conditions are included in the designations to mitigate any adverse effects associated with the construction of the Pukekohe transport network.

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- 5) The Ministry supports the provision of active transport modes (walking and cycling) as proposed through the Pukekohe Transport Network.
 - 6) Overall, the Ministry's submission is neutral on the NoRs subject to the following request for changes being made to the conditions including:
 - Updating acronym/terms and conditions within the Designations to be consistent with other conditions Te Tupu Ngātahi have agreed to on other NoRs through the Supporting Growth Programme;
 - Amendments to the Stakeholder Communication and Engagement Management Plan ("**SCEMP**") to include reference to schools within proximity to the Pukekohe Transport Network; and
 - Amendments to the Construction Traffic Management Plan ("**CTMP**"), to avoid using any roads around schools during the AM and PM peak periods.
 - 7) The Ministry wishes to be heard in support of its submission.

OVERVIEW OF THE MINISTRY'S RESPONSIBILITIES & LAND INTERESTS

- 8) The Ministry is the Government's lead advisor on the New Zealand education system. The Education and Training Act 2020 sets out the obligations and responsibilities of the Ministry. The Ministry have responsibility for the education outcomes of students across the full spectrum of the education sector, including pre-school, primary and secondary levels.
- 9) The Ministry assesses population changes, school roll fluctuations and other trends and challenges impacting on education provision at all levels of the education network to identify changing needs within the network so the Ministry can respond effectively.
- 10) The Minister of Education is a Requiring Authority under the Resource Management Act 1991 ("**RMA**") and has over 400 education purposes designations in the Auckland Unitary Plan: Operative in Part ("**AUP:OP**").
- 11) The Ministry has responsibility for all education property owned by the Crown. This involves managing the existing property portfolio, upgrading and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing.
- 12) The Ministry is therefore a considerable stakeholder and social infrastructure provider in terms of activities that may impact existing and future educational facilities and assets in the Auckland region.
- 13) The Ministry has multiple education sites within the Pukekohe, Paerata and Drury West area including Karaka School, Wesley Primary School, Wesley College, Paerata School, Pukekohe East School, Pukekohe North School, Tamaoho School, Pukekohe Intermediate School, Pukekohe High School, Valley School, and Pukekohe Hill School.
- 14) The location of each NoR in relation to the Ministry's existing assets is shown in Figure 1.

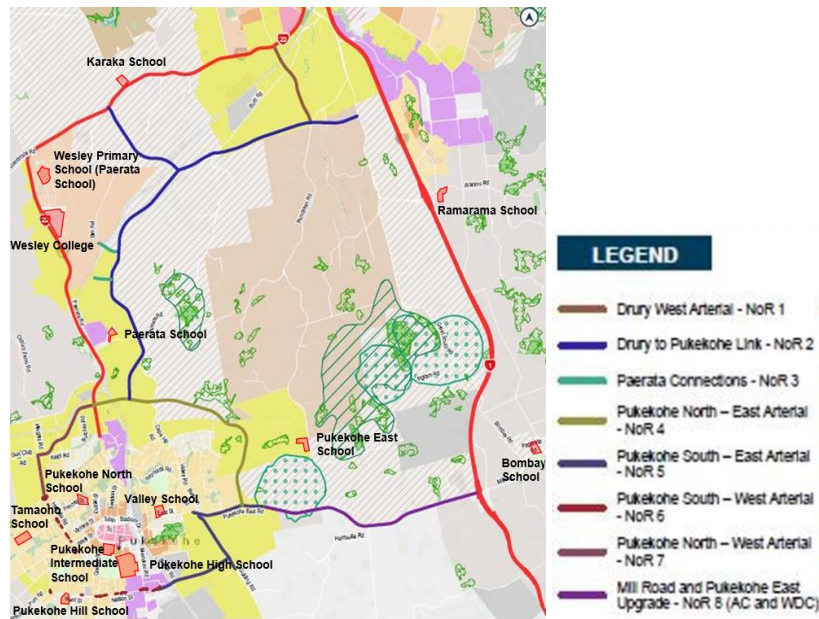


Figure 1: Project Overview – Location of Eight NoRs (identified in the legend) in relation to the Ministry of Education’s School Network (outlined in red)

MINISTRY OF EDUCATION’S SUBMISSION

- 15) Under the RMA, decision makers must have regard to the health and safety of people and communities. Furthermore, there is a duty to avoid, remedy or mitigate actual and potential adverse effects on the environment.
- 16) The eight NoRs to designate land for future strategic transport corridors in Pukekohe, Paerata, and Drury West areas, enable the future construction, operation, maintenance of transport infrastructure to support anticipated growth within Auckland’s future urban zoned area over the next 10 – 30 years. The project supports improved walking and cycling, public transport, and general traffic connections. The key reasons for this investment are to improve safety, better integrate transport and land use, improving accessibility, transport resilience, and promoting travel choice.
- 17) The Ministry broadly supports the Project aim to plan transport investment in Auckland’s future urban zoned areas. The project will improve active mode facilities, enhancing the safety of students walking and cycling to and from school.
- 18) The Ministry supports the provision of shared pathways, bi-directional cycle ways, upgrading of intersections, that will provide safe access to the current and future wider school network. Encouraging mode shift will provide significant health benefits for students and staff, reducing traffic generation at pick up and drop off times. Schools should be well serviced by safe and accessible pedestrian and cycling links as well as public transportation facilities, and it is considered that the proposed upgrades will provide adequate cycling and walking infrastructure to the surrounding area.
- 19) The Pukekohe project is a large programme of works. The quantum of construction required to deliver the projects will likely have temporary adverse effects on the surrounding environment. There are several schools in proximity to the NoRs. There is potential for these schools to be affected by traffic, noise and other nuisance effects arising from future construction works. The construction timing and staffing is yet to be determined, so there is uncertainty regarding the construction methodology, including the routes for construction vehicles and the location of construction laydown areas.

-
- 20) The Ministry seeks to appropriately address and manage construction related effects and the ongoing potential effects the project may have on the operation and management of the schools for NoRs 2, 4, 5, 6, 7 and 8. Additionally, as the project is planned for works over the next 10 to 30 years, the Ministry is also submitting on NoRs 1 and 3 in the event any new schools are developed in the project area.
- 21) The key issues that the Ministry has concerns about in relation to the NoRs include construction traffic effects and stakeholder engagement which are outlined below. Consequential changes are also sought to the acronyms/terms and conditions of the NoRs for consistency with other Te Tupu Ngātahi designations. The requested changes are included in **Appendix 1** to this submission.

Construction traffic effects

- 22) The surrounding schools (and any future schools) will potentially be affected by an increased volume of heavy vehicles to access the construction area of the NoRs. This is a traffic safety concern for students walking and cycling to school at peak pick up and drop off times.
- 23) Condition [17] requires the preparation of a CTMP prior to the start of construction. The Ministry supports the inclusion of this condition but requests that specific reference is made to education facilities to address the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours (for example on roads servicing educational facilities during pick up and drop off times) to manage vehicular and pedestrian traffic near educational facilities or to manage traffic congestion.
- 24) Amendments made to conditions are requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing¹ and to conditions agreed through the Te Tupu Ngātahi Airport to Botany Bus Rapid Transit Project NoRs².

Stakeholder engagement

- 25) The Ministry supports the establishment of SCEMP as proposed condition [8]. The Ministry considers that they are a key stakeholder in this Project, and specific engagement is required to manage construction effects on the schools. Amendments made to conditions are requested to identify schools within proximity to the project and to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.

RELIEF SOUGHT

- 26) In principle, based on the above, the Ministry supports the proposed walking and cycling facilities proposed in each NoR application providing improved active mode connectivity is essential to provide existing and future communities with a sustainable means of accessing education facilities in Pukekohe, Paerata, and Drury West.
- 27) To ensure effects associated with the NoRs on the Ministry are appropriately managed, it is requested that appropriate conditions are imposed on the designations in accordance with the RMA. It is requested that amendments to conditions as set out in **Appendix 1** are adopted by Te Tupu Ngātahi. The amendments sought include:
- a) Amendment to the acronym/terms to be consistent with other Te Tupu Ngātahi designations to include a definition of 'educational facilities' and 'stakeholders';
 - b) Inclusion of the Ministry and schools in the SCEMP; and
 - c) Inclusion of the Ministry and schools as stakeholder in the CTMP.

¹ In the Matter of Notices of Requirement for designations by Auckland Transport collectively known as the Warkworth Package - Chris Scafton Statement of Rebuttal Evidence on behalf of Auckland Transport – Strategic Planning and Conditions dated 26 October 2023.

² In the Matter of Notices of Requirement for designations by Auckland Transport collectively known as the Airport to Botany Bus Rapid Transit Project – Requiring Authority Primary Evidence Appendix B -ref: EV148B RA.

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- 28) Overall, the submission is neutral subject to the above changes being made to the designation conditions.
 - 29) Such other consequential amendments to the NoRs may be necessary to give effect to the relief sought through this submission.
 - 30) The Ministry wishes to be heard in support of its feedback.

APPENDIX 1: AMENDMENTS SOUGHT TO CONDITIONS

Amendments are sought to the proposed abbreviations and definitions along with conditions to be included in all of the NoRs (NoR 1 – 8). Changes to these provisions sought by the Ministry are noted below.

PROPOSED ABBREVIATIONS AND DEFINITIONS

Acronym/terms for all Te Tupu Ngātahi Pukekohe Transport Network designations changes sought to conditions identified as - <u>Underlined</u> and strikethrough		
Acronym/Term	Definition	Submission Comment
<u>Educational Facilities</u>	<p>Facility used for education to secondary level.</p> <p><u>Includes:</u></p> <ul style="list-style-type: none"> ▪ <u>Schools and outdoor education facilities; and</u> ▪ <u>Accommodation, administrative, cultural, religious, health, retail, and communal facilities accessory to the above.</u> <p><u>Excludes:</u></p> <ul style="list-style-type: none"> ▪ <u>Care centres; and</u> ▪ <u>Tertiary education facilities</u> 	<p>Inclusion requested</p> <p>The requested term and definition are consistent with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing³.</p>
<u>Stakeholders</u>	<p><u>Stakeholders to be identified in accordance with Condition [x], which may include as appropriate:</u></p> <ol style="list-style-type: none"> a) <u>Adjacent owners and occupiers;</u> b) <u>Adjacent business owners and occupiers;</u> c) <u>Central and local government bodies;</u> d) <u>Community groups;</u> e) <u>Developers;</u> f) <u>Development agencies;</u> g) <u>Educational facilities; and</u> h) <u>Network utility operators.</u> 	<p>Inclusion requested</p> <p>The requested term and definition are consistent with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p>

³ In the Matter of Notices of requirement for designations by Auckland Transport collectively known as the Warkworth Package - Chris Scrafton Statement of Rebuttal Evidence on behalf of Auckland Transport – Strategic Planning and Conditions dated 26 October 2023.

PROPOSED CONDITIONS

Proposed conditions as per other Te Tupu Ngātahi designations		
<u>Underlined and strikethrough</u> – changes proposed for all NoRs		
No.	Condition	Submission Comment
General Conditions		
[x]	<p>Stakeholder Communication and Engagement</p> <p>(a) <u>At least 6 months prior to the start of detailed design for a Stage of Work, the Requiring Authority shall identify:</u></p> <p>(i) <u>A list of Stakeholders;</u></p> <p>(ii) <u>A list of properties within the designation which the Requiring Authority does not own or have occupation rights to; and</u></p> <p>(iii) <u>Methods to engage with Stakeholders and the owners and occupiers of properties identified in (a)(i) – (ii) above.</u></p> <p>(b) <u>A record of (a) shall be submitted within an Outline Plan for relevant Stage of Work.</u></p>	<p>Inclusion requested</p> <p>The condition is requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p>
Pre-construction Conditions		
8	<p>Stakeholder Communication and Engagement Management Plan (SCEMP)</p> <p>(a) A SCEMP shall be prepared in consultation with Stakeholders, community groups and organisations prior to the Start of Construction any Outline Plan being submitted.</p> <p>(b) The objective of the SCEMP is to identify how the public Stakeholders (including directly affected and adjacent owners and occupiers of land) will be engaged with prior to and throughout the Construction Works. To achieve the objective of the SCEMP shall include:</p> <p>(i) <u>a list of stakeholders;</u></p> <p>(ii) <u>a list of properties within the designation which the Requiring Authority does not own or have occupation rights to;</u></p> <p>(iii) <u>methods to engage with Stakeholders and the owners of properties identified in (b)(ii) above;</u></p> <p>(i) At least 18 months prior to any Outline Plan being submitted, the Requiring Authority shall identify:</p> <p>A. The properties whose owners will be engaged with;</p> <p>B. A list of key stakeholders, community groups, organisations and business who will be engaged with;</p> <p>C. Methods and timing to engage with landowners and occupiers whose access is directly affected</p> <p>(ii) The SCEMP shall include:</p> <p>A. Detailed of (b)(i)A to C;</p> <p>(iv) <u>The contact details for the Project Liaison Person. These details shall be on the Project website, or equivalent virtual information source, and prominently displayed at the main entrance(s) to the site(s);</u></p>	<p>Amendment requested</p> <p>Amendments are requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p> <p>A list of schools to be engaged with has also been included in the condition as they are located in proximity to the Pukekohe Project and may be subject to construction traffic effects associated with the works.</p>

	<p>(v) The procedures for ensuring that there is a contact person available for the duration of Construction Works, for public enquiries or complaints about the Construction Works;</p> <p>(vi) Methods for engaging with Mana Whenua, to be developed in consultation with Mana Whenua;</p> <p>(vii) <u>Methods and timing to engage with landowners and occupiers whose access is directly affected;</u></p> <p>(viii) <u>Methods for engaging with the Ministry of Education (MoE), surrounding schools (including Karaka School, Wesley Primary School, Wesley College, Paerata School, Pukekohe East School, Pukekohe North School, Tamaoho School, Pukekohe Intermediate School, Pukekohe High School, Valley School, and Pukekohe Hill School), and any future schools. The MoE and Schools must be contacted ten days prior to the start of any construction within 500 metres of the school boundary. Contact details of the construction manager must be shared with the Ministry of Education, Schools, and future schools (should the school have any safety concerns during construction).</u></p> <p>(ix) Methods to communicate key project milestones and the proposed hours of construction activities including outside of normal working hours and on weekends and public holidays, to the parties identified in (b)(i) and (ii) above; and</p> <p>(x) Linkages and cross references to communication and engagement methods set out in other conditions and management plans where relevant.</p> <p>(c) Any SCEMP prepared for a Stage of Work shall be submitted to Council for information ten working days prior to the Start of Construction for a Stage of Work.</p>	
Construction Conditions		
17	<p>Construction Traffic Management Plan (CTMP)</p> <p>(a) A CTMP shall be prepared prior to the Start of Construction for a Stage of Work. The objective of the CTMP is to avoid, remedy or mitigate, as far as practicable, adverse construction traffic effects.</p> <p>To achieve this objective, the CTMP shall include:</p> <p>(i) methods to manage the effects of temporary traffic management activities on traffic;</p> <p>(ii) measures to ensure the safety of all transport users;</p> <p>(iii) the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours (<u>for example on roads servicing educational facilities during pick up and drop off times</u>) to manage vehicular and pedestrian traffic near <u>educational facilities</u> schools or to manage traffic congestion;</p> <p>(iv) site access routes and access points for heavy vehicles, the size and location of parking areas for plant, construction vehicles and the vehicles of workers and visitors;</p>	<p>Amendment requested</p> <p>Amendments are requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p> <p>Additionally, wording has also been amended to reflect changes made to the Te Tupu Ngātahi Airport to Botany Bus Rapid Transport conditions as included in the Primary Evidence prior to the Council hearing⁴.</p>

⁴ In the Matter of Notices of Requirement for designations by Auckland Transport collectively known as the Airport to Botany Bus Rapid Transit Project – Requiring Authority Primary Evidence Appendix B -ref: EV148B RA.

	<ul style="list-style-type: none"> (v) identification of detour routes and other methods to ensure the safe management and maintenance of traffic flows, <u>including public transport service, including pedestrians and cyclists, on existing roads;</u> (vi) methods to maintain vehicle access to <u>and within</u> property and/or private roads <u>for all transport modes</u> where practicable, or to provide alternative access arrangements when it will not be; (vii) the management approach to loads on heavy vehicles, including covering loads of fine material, the use of wheel-wash facilities at site exit points and the timely removal of any material deposited or spilled on public roads; (viii) methods that will be undertaken to communicate traffic management measures to affected road users (e.g. residents/public/stakeholders/emergency services); (ix) <u>auditing, monitoring and reporting requirements relating to traffic management activities shall be undertaken in accordance with the New Zealand Guide to Temporary Traffic Management or any subsequent version;</u> (x) <u>details of minimum network performance parameters during the construction phase, including any measures to monitor compliance with the performance parameters; and</u> (xi) <u>details of any measures proposed to be implemented in the event thresholds identified in (x) being exceeded;</u> 	
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13 November 2023

By email to: unitaryplan@aucklandcouncil.govt.nz

Submission on Pukekohe Notices of Requirement 1-8

1 Introduction

- 1.1 Counties Energy thanks you for the opportunity to provide a submission concerning the Pukekohe Notices of Requirement 1 to 8. This submission applies to all Notices of requirement. Specific comments concerning individual NoRs are made in addition to the general comment where required.

2 About Counties Energy

- 2.1 Counties Energy Limited (CEL) is an electricity operator under the Electricity Act, a network operator under the Telecommunications Act, and a network utility operator under the Resource Management Act. CEL is a requiring authority in respect of its electricity network. The Civil Defence and Emergency Management Act also cites electricity distribution as a lifeline utility.
- 2.2 CEL owns, manages and operates an electricity distribution network supplying nearly 45,000 homes, farms and businesses in the southern Auckland, northern Waikato and Hauraki District areas. Electricity is an essential infrastructure that enables development to occur. Much of the network supplying CEL's customers is overhead in the rural areas, with a mix of overhead and underground assets in the urban areas, particularly in the eastern part of the network which has and continues to experience high levels of growth.
- 2.3 CEL receives power from the national grid at Bombay and Glenbrook Grid Exit points, from where it is conveyed at either 110kV or 33kV (high voltage) to nine substations before being converted to either 22kV or 11kV (medium voltage) to be distributed via overhead lines, underground cables, transformers and associated equipment so it can be used by the customer, whether at 400V (low voltage) or at medium voltages for larger businesses.
- 2.4 Future proofing and protection of existing assets is key to meeting the needs of the communities and businesses CEL serves in light of pressures from urban growth. CEL sees NoRs 1-8 as providing



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Private Bag 4
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Energy
Reimagined

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countiesenergy.co.nz

potential network utility corridors and therefore opportunities for extension of its distribution network between substations and to accommodate the future demands of urban expansion in and around the Drury and Pukekohe area.

3 Submission Points

3.1 CEL is generally supportive of the alignment of the new roads indicated by the Proposed Designation Boundaries indicated on drawings SGA-DRG-STH-002-1000, 2000, 2100, 2200, 2300, 2400, 3000, 4000, 4100, 5000, 5100, 6000, 6100, 7000, 8000 and 8100.

3.2 The proposed NoR alignments offer opportunity for extension of the distribution network.

3.3 However, we note the following omissions across all the afore mentioned drawings:

Existing overhead infrastructure in existing road corridors and proposed designations

Medium voltage (11kV and 22kV) lines and low voltage lines

Fibre cable

Pole locations in urban areas where footpaths and cycleway upgrades occupy the back berm

Existing underground infrastructure in existing road corridors and proposed designations

Fibre

Low voltage cables

Equipment associated with underground electricity reticulation located in the berm e.g., pad mounted transformers, switchgear, link boxes and network pillars

3.4 CEL will require further consultation and detailed planning concerning parts of NoRs 1-8 which may impact the location and safe operation of the assets listed under paragraph 3.3.

3.5 CEL will also require further consultation and detailed planning where it is proposed to cut or fill in the vicinity of existing overhead or underground assets in order to maintain compliance with NZECP34:2001 New Zealand Electrical Code of Compliance for Electrical Safe Distances, and to maintain optimum operation and safety around equipment associated with underground electricity distribution and fibre cables.

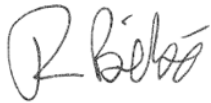
3.6 NoR 5, Drawing 5000 indicates the construction of a bridge over the rail corridor at Station Road, Pukekohe. This will impact the Pukekohe-Tuakau 110kV line which conveys electricity between the two zone substations. Early consultation and detailed planning will be required concerning works in the vicinity of this section of crucial infrastructure.

3.7 NoR 5, Drawing 5000 indicates alignment of a new road with associated cut and fill along the alignment of a section of the existing Bombay-Pukekohe 110kV line which is built within an easement between Station Road and Golding Road. Further detailed consultation will be required concerning the road design and construction round this line.

3.8 NoR 8, Drawing 8100, Mill Road. The alignment of the high voltage Bombay-Pukekohe (north) 110kV line is incorrect, where it crosses to the north side of Mill Road; and appears to be in area identified for future cut and installation of a culvert, both of which could compromise the safe operation of a critical asset. Further consultation and detailed planning is required.

CEL requests that Auckland Transport and Waka Kotahi respectively give consideration to the points raised above. We welcome the opportunity to discuss these matters further.

Yours faithfully

A handwritten signature in black ink, appearing to read 'R Bilbé', written in a cursive style.

Rachel Bilbé
Land and Easement Specialist

rachel.bilbe@countiesenergy.co.nz

027 622 5612

13 November 2023

Auckland Council
AUCKLAND

Sent via e-mail: unitaryplan@aucklandcouncil.govt.nz

Dear Sir/Madam

NOTICES OF REQUIREMENT 1 THROUGH 8 - PUKEKOHE

The Campaign for Better Transport Incorporated (**CBT**) wish to put forward our submission in relation to the following Notices of Requirement:

- Pukekohe: Drury West Arterial (NoR 1)
- Pukekohe: Drury – Pukekohe Link (NoR 2)
- Pukekohe: Paerata Connections (NoR 3)
- Pukekohe: Pukekohe North-East Arterial (NoR 4)
- Pukekohe: Pukekohe South-East Arterial (NoR 5)
- Pukekohe: Pukekohe South-West Upgrade (NoR 6)
- Pukekohe: Pukekohe North-West Upgrade (NoR 7)
- Pukekohe: Mill Road and Pukekohe East Road Upgrade (NoR 8)

Background

The CBT is always cautious when it comes to the construction of roading projects, and our default position would be one of opposition unless a solid case existed for the construction of the specific project involved.

The CBT is also mindful that in the relevant area:

- The railway line to Pukekohe is being electrified, with suburban service expected to be restored in next year. Assuming the initial timetable is consistent with service provided before the line closed for electrification works in 2022, this would mean a twenty-minute frequency between Pukekohe and the Auckland Central Business District during peak and a thirty-minute frequency during off-peak.
- Existing road infrastructure is unlikely to be fit for purpose in the coming decades. There needs to be separation between arterial routes and non-arterial routes and having non-arterial uses on an arterial route is not desirable from either a transport or an urban design perspective.

We make brief comments below, first in the general sense and then in relation to specific projects.

Cycle Infrastructure

We are heartened to see that cycle infrastructure is forming a significant component of the proposed routes, including the Drury-Pukekohe Link, and fully support this component of the proposals.

Twenty Year Lifespan

We note the resource consent has a lifetime of twenty years, which we agree with. The lifespan ensures the corridor is preserved and not developed on, but also means the impacts of rail electrification can be observed prior to construction work being undertaken.

Should the rail electrification have a material impact on traffic levels along the existing routes far and beyond that anticipated, then we would hope that the specifics of these projects are reconsidered in light of the changed facts.

Drury-Pukekohe Link (Pukekohe Expressway)

We are neutral when it comes to the Pukekohe Expressway. The construction of this road would enable the existing State Highway 22 to be downgraded to a non-arterial route and used accordingly (the best example might be the relationship between Great South Road and the Southern Motorway, with the former being used for local purposes and the latter being used as the major through route). The choice of route along the outskirts of the planned urban area is useful – this ensures no division of the urban area by a major road.

Mill Road

We are in favour of the planned upgrade to Mill Road. This road forms the primary link between Pukekohe, the Southern Motorway and the Waikato Expressway and is likely to continue doing so even once the new Pukekohe Expressway has been opened. We also note the road is currently hazardous, having had its speed limit decreased from 100km/h to 80km/h to reflect the dangerous conditions posed by this road. We anticipate the upgrades would ensure the road would become fit for purpose and improve safety outcomes.

A case could be made for the third and fourth lanes proposed to have some sort of restriction on them similar to such lanes along State Highway 20B (Puhinui Road). This might for instance take the form of a transit and heavy goods lane. We are mindful the road is in a primarily rural area and so demand flows are different to that within an urban area where bus lanes and the like would be more appropriate.

Pukekohe North-West Arterial and North-East Arterial

We are neutral when it comes to these roads. We see the value of these roads as providing a connection between the upgraded Mill Road and the routes heading to points west of Pukekohe (for example Waiuku) without road traffic needing to go through Pukekohe residential and commercial streets. We hope the opportunity would be taken to change the nature of some roads through Pukekohe to make them friendly toward other uses (for example, decreasing the speed limit of some roads through the Pukekohe village)

Pukekohe South-East Arterial and South-West Upgrade

We are neutral when it comes to these roads. We see the value of the South-East Arterial as providing a connection between the upgraded Mill Road and the routes heading to Tuakau and the northern Waikato without road traffic needing to go through Pukekohe residential and commercial streets (in particular, the King Street/Massey Avenue/Manukau Road/East Street roundabout).



Campaign For Better Transport

If Auckland Council have any further queries, please contact us at committee@bettertransport.org.nz. We will be pleased to comment further if requested.

Yours faithfully

The Campaign for Better Transport Incorporated



Jodi Johnston (Mr.)
Convenor

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:965] Notice of Requirement online submission - Harjinder Singh
Date: Monday, 13 November 2023 9:46:10 pm

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

Contact details

Full name of submitter: Harjinder Singh

Organisation name: Singh and Kaur Ltd

Full name of your agent: Ashish Saini

Email address: saini@xtra.co.nz

Contact phone number: 027 277 2271

Postal address:

7 Verona place

Karaka

Auckland 2113

Submission details

Name of requiring authority: Waka Kotahi NZ Transport Agency

The designation or alteration: Pukekohe : NOR 8 Mill Road and Pukekohe East Road Upgrade

The specific provisions that my submission relates to are:

Address: 165C Mill road, Bombay, Auckland Record of title number: 623548 SG reference number: 533656

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

The reason for my or our views are:

Record of title number: 623548 SG reference number: 533656 We will be having a meeting with Support Growth regarding this project later this month. Us landowners are overseas so have not been able to attend anything yet. We are concerned about various factors not limited to but including the following: - the effect on vehicle crossing and access to the property - the effect on the drive way of the property - the acquisition of land from us that will be involved - the effect on the business that is run on the property - any other factors that will or can be detrimental to us, we hope to explore these further in our meeting. The information provided by Supporting Growth is extremely technical and lengthy meaning it has been largely beyond our scope to understand. We hope to have a better understanding of all information in our meeting later this month. We have made this submission despite not having had the meeting yet since today is a deadline for submissions.

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

In the meantime, we'd like comment and elaboration on our concerns as well as how they'll be addressed.

Submission date: 13 November 2023

Attend a hearing

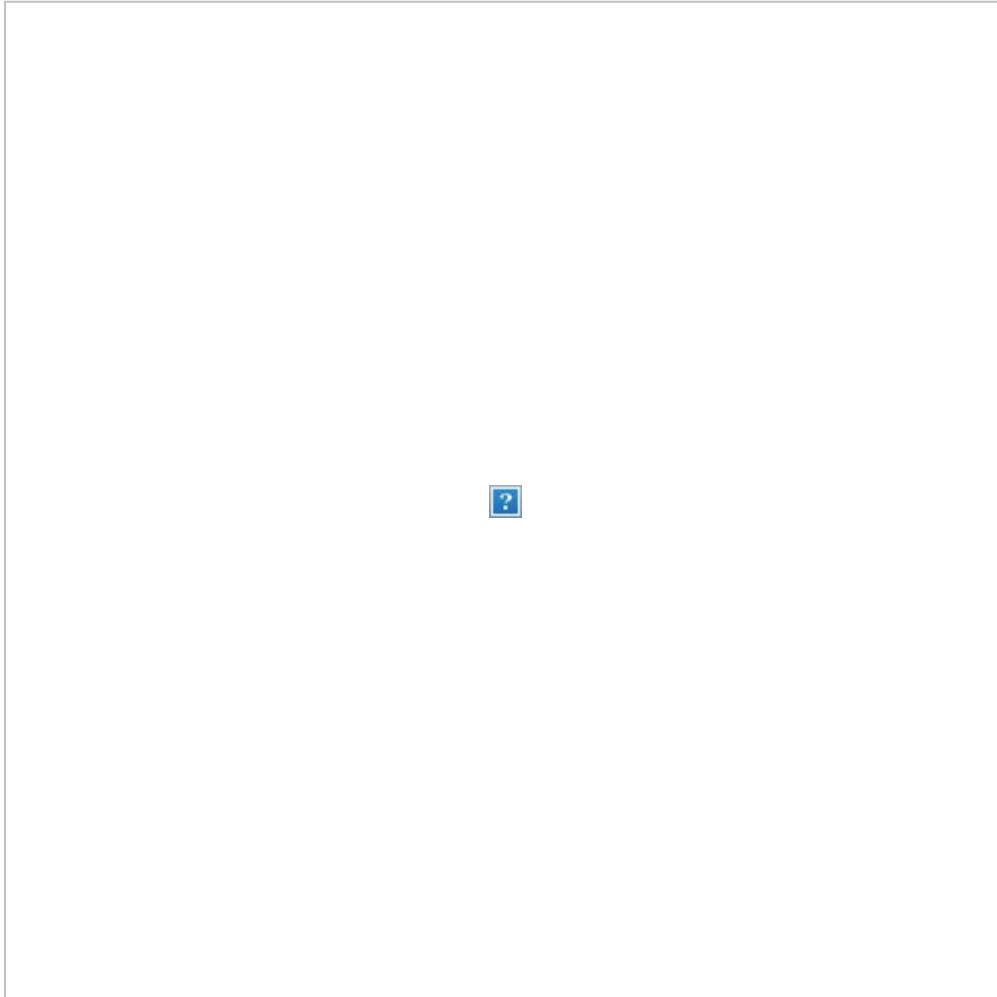
Do you wish to be heard in support of your submission? Yes

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

Declaration

I accept and agree that:

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



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ATTACHMENT TWO

FRANKLIN LOCAL BOARD RESOLUTION 28 NOVEMBER 2023

MEMO TO: Joe McDougall - Planner

COPY TO: Denise Gunn

FROM: Denise Gunn - Democracy Advisor

DATE: 29 November 2023

MEETING: Franklin Local Board Meeting of 28/11/2023

Please note for your action / information the following decision arising from the meeting named above:

FR/2023/191 **Local Board Views on eight Notices of Requirement from Auckland Transport and Waka Kotahi for the Pukekohe Transport Network**

FILE REF CP2023/17428

AGENDA ITEM NO. 15

15 Local Board Views on eight Notices of Requirement from Auckland Transport and Waka Kotahi for the Pukekohe Transport Network

Resolution number FR/2023/191

MOVED by Member A Kinzett, seconded by Chairperson A Fulljames:

That the Franklin Local Board:

- a) **whakarite - provide local board views on eight Notices of Requirement (NoRs) for the Pukekohe Transport Network as outlined in the below table 1: Franklin Local Board Feedback on Pukekohe Transport Network Notices of Requirement;**

o
o **Table 1: Franklin Local Board Feedback on Pukekohe Transport Network Notices of Requirement**

Notice	Project	View
NoR 1	Drury West Arterial	Support as part of the new connection to the Ngaakoora Train Station
NoR 2	Drury – Pukekohe Link	Recommend that the-Highway from Ramarama to Pukekohe retains space for four lanes rather than the proposed two lanes,

		noting that the population in Pukekohe is likely to significantly exceed current growth projections in response to the National Policy Statement for Urban Development.
NoR 3	Paerata Connections	Support
NoR 4	Pukekohe North-East Arterial	Support
NoR 5	Pukekohe South-East Arterial	Do not support using the Golding Road intersection as the outer ring road connection point. The board suggests that more thought is needed on how to connect across Mill Road, and that it would be preferable that connection into the southeast be at the same point as the proposed new north eastern intersection.
NoR 6	Pukekohe South-West Upgrade	Do not support the funneling of traffic past Pukekohe Hill Primary School (corner of Ward Street and Green Lane) as this will create safety and congestion issues.
		Do not support use of Helvetia Road as this proposal would split a residential community, create barriers to modal shift, and undermine the quality of life for those residents.
		Recommend that the programme reconsider the use of Gun Club Road and Patumahoe Road as part of the outer ring route as previously suggested, noting that this would support effective diversion of traffic from residential areas and the town centre and facilitate efficient freight movement
NoR 7	Pukekohe North-West Upgrade	Support the north-east and north-west (to the intersection of Gun Club Rd) sections of the ring road around Pukekohe as proposed.
NoR 8	Mill Road and Pukekohe East Road Upgrade	Support the four laning of Mill Rd to Harrisville Rd, but recommend more work done on an alternative connection point to the Pukekohe ring road. This would involve working with Waikato District Council because of the border issues in this area. , however the board notes that this is possible and has been undertaken as part of other notices in this package.

- b) **whakaae / agree that this programme of work is essential in supporting the future planning of Pukekohe-Paerata and south Drury, and future economic, environmental, social, and cultural well-being in the area**
- c) **tautoko / support the inclusion of cycling and walking infrastructure in general and recommend that the Pukekohe-Paerata Paths Plan is referenced when assessing the suitability of NoR notices**
- d) **tuhi ā taipitopito / note that that this package does not adequately address the needs of freight that are unique to the wider Pukekohe area or the likely negative impacts of freight traffic use of the network on significant quality of**

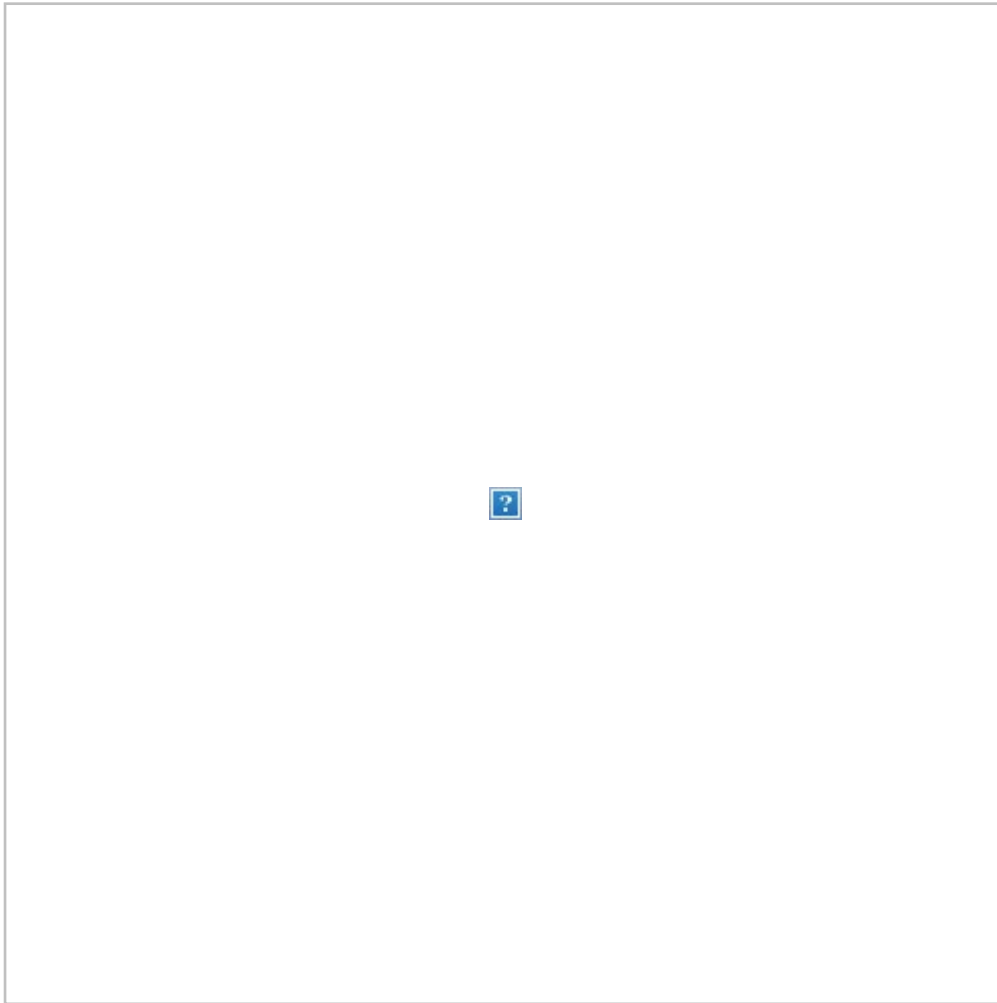
life and safety in the local community

- e) recommend careful consideration on whether the scope of notices facilitates effective and safe freight movement which should be prioritised to enable carbon emissions to be reduced in line with regional and national climate policy**
- f) reiterate that it is essential that planning and designation of key intersection treatments e.g. the intersection of Blackbridge Road and State Highway 22 and the Bombay interchange are critical to achieving the purpose of this programme and strongly recommend these are considered in the context of the NoR process; however acknowledge that this is outside the scope of the Notice of Requirement process**
- g) recommend that the expansion of the NZ Steel site at Glenbrook, which will develop 300 hectares of industrial land and increase south-bound freight and general vehicle movements, is considered as part of the notice assessment**
- h) whakatau / appoint Deputy Chair Alan Cole to speak to the local board views at a hearing on the Notices of Requirement**
- i) tautapa / delegate authority to the chairperson of Franklin Local Board to make a replacement appointment in the event the local board member appointed in resolution h) is unable to attend the NoRs hearing.**

CARRIED

SPECIFIC ACTIONS REQUIRED:

Denise Gunn
Democracy Advisor, Franklin Local Board
Phone 021 981 028
Email denise.gunn@aucklandcouncil.govt.nz



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ATTACHMENT THREE

AUCKLAND COUNCIL SPECIALIST REVIEWS (NOR2 & NOR8)

Arboricultural Memorandum

Prepared for: Joe McDougall
Auckland Council – Plans and Places
Joe.mcdougall@aucklandcouncil.govt.nz

Arborlab Limited
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Bay
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3302

Prepared by: Leon Saxon
027 495 7221
leon@arborlab.co.nz

Head Office
7 Paul Matthews Road,
Albany Auckland 0632

Date: 06 December 2023

Re: Arboricultural Assessment of 8 NOR's for
the Pukekohe Transport Network

Job Ref. 37936

1. Introduction

- 1.1 Auckland Transport and Waka Kotahi have collectively lodged a package of eight Notices of Requirement referred to as Pukekohe Transport Network. The Notices of Requirement (NOR's) are to designate land for the future construction, operation and maintenance of transport infrastructure in the Pukekohe, Paerata and Drury areas of Auckland. One of the NOR's also includes a portion of road within the Waikato region (NOR8). A full description of the proposal is provided in the information package submitted.
- 1.2 This memorandum is provided as specialist arboricultural advice for the planners preparing the s42a report for the NOR's.
- 1.3 In preparing this memorandum, the following documents have been reviewed:
 - Pukekohe Transport Network Assessment of Arboricultural Effects, prepared by Craig Webb, dated September 2023
 - Pukekohe Transport Network *Assessment of Effects on the Environment* Version 1.0 prepared by Alicia McKenzie, Vicky Hu, Helen Hicks and dated 09/2023.
- 1.4 Whilst reviewing those documents I also reviewed each of the relevant general arrangement plans for each of the NOR's.
- 1.5 I also attended the project briefing at the Te Tupu Nga Tahī offices and the project-wide site visit on the 29th June 2023.



2. Qualifications and Experience

- 2.1 My full name is Leon Saion.
- 2.2 I am a Senior Consultant Arborist employed by Arborlab Ltd, 70 Paul Matthews Road, Albany, Auckland 0632.
- 2.3 Arborlab is one of New Zealand's leading green space asset management specialists. One of its services to provide arboriculture services relating to all aspects of tree management from practical arboriculture and legal government processes to complex risk analysis and assessment and providing expert witness services.
- 2.4 I have been employed by Arborlab since March 2011. I assess and provide specialist input into resource consent applications and prepare arboricultural reports to support resource consent applications for large infrastructure projects.
- 2.5 I hold a Diploma in Arboriculture from Wintec, the Waikato Institute of Technology. I am also a registered user of the Quantified Tree Risk Assessment System and a Qualified International Society of Arboriculture Tree Risk Assessor.
- 2.6 I have over 20 years' experience specialising in arboriculture.
- 2.7 I spent six years working for Auckland Council as an arborist in the Resource Consents and Compliance Department (North).
- 2.8 Since 2011, I have provided specialist input to resource consent applications on a consultancy basis to the Auckland Council Consents and Compliance Department as an employee of Arborlab.
- 2.9 I also I have experience in providing expert evidence in relation to major roading projects (Auckland's Eastern Busway) and cycle paths (shared paths (Glen Innes to Tamaki Drive Shared Path and Te Whau Shared Path).



3. Key Arboricultural Issues

- 3.1 The land that the proposed designations cover are a variety of land use types, with the vegetation present generally correlating with those land uses. The zoning of land that the designations cover ranges between Countryside Living, Mixed Rural and Future Urban Zone (FUZ).
- 3.2 The majority of trees located within the proposed designations are not protected by current DP rules, but rather by RP rules. The tree protection relating to the rural areas is generally due to being located within rural zoned areas measuring greater than 4m in height or 400mm in girth. Within these rural zoned areas and Future Urban zoned areas, trees located within the road reserve are able to be removed as a Permitted Activity (2.4.3.A90). As the land use changes and these areas become residential zones, the trees that are currently protected by RP rules within the sites will become unprotected, while the trees within the road reserves become protected when measuring greater than 4m in height or 400mm in girth.
- 3.3 Only two of the NOR areas contain trees currently protected by DP rules, NOR1 and NOR2. These trees are protected by virtue of being located in road reserve adjacent to residential zoned land, being located within an Outstanding Natural Feature (ONF) or being a scheduled notable tree.

4. Relevant Auckland Unitary Plan Rules – Vegetation

- 4.1 I have reviewed the rules that have been set out in Table 3.3 and Table 3.4 of the Assessment of Arboricultural Effects. I concur that the rules that have been outlined are relevant to the proposal and are the correct planning mechanism with regards to the Notice of Requirement.

5. Adequacy of Information

- 5.1 The arboricultural report is considered to have utilised suitable methodologies for obtaining the relevant arboricultural data to inform the assessment of effects. The information provided is considered to be sufficient to allow an informed assessment.



6. Assessment

NOR 1

- No trees protected by the DP provisions affected within or adjacent to the designation boundary.

NOR 2

- No trees protected by the DP provisions affected within or adjacent to the designation boundary.

NOR 3

- No trees protected by the DP provisions affected within or adjacent to the designation boundary.

NOR 4

- No trees protected by the DP provisions affected within or adjacent to the designation boundary.

NOR 5

- This area contains two groups of trees protected by the DP provisions growing within road reserve, between the footpath and private properties to the North of Pukekohe East Road. The trees are protected by virtue of being located within road reserve and the adjacent residential land zoning. Species include, pūriri, totara and pōhutukawa. The trees are not located within the designation but have root zones extending into it. Notwithstanding this, the proposal involves widening the road on the southern side for active mode transport. As such, the design does not impact on the identified trees.

NOR 6

- No trees protected by the DP provisions affected within or adjacent to the designation boundary.

NOR 7

- No trees protected by the DP provisions affected within or adjacent to the designation boundary.

NOR 8

- There are a number of trees and groups of trees within NOR and covered by a Outstanding Natural Feature Overlay (ONF) affected by the proposal. The trees are well described at section 2.2 of the arboricultural assessment of effects report.



- 7.9 Three notable tree listings are located within or adjacent to the NOR boundaries.
- 7.10 This includes one Norfolk Island Pine and one English oak at 10 Morgan Road, listed as Notable Tree Schedule 27. The listing is somewhat ambiguous, as there are three similarly aged and sized Norfolk Island pine trees on the property. Nevertheless, the design poses minimal risk to the trees.
- 7.11 A mature pūriri at 203 Mill Road, Notable Tree Schedule 270 is identified as potentially requiring a portion of its root zone removed. It has been identified as likely requiring removal.
- 7.12 A redwood tree located at 100C Mill Road, Notable Tree Schedule 100 will be located within the designation and may require works within its root zone.
- 7.13 A solitary totara tree located on the southern side of Pukekohe East Road which is located within Waikato Regional Council land requires removal. The tree is protected under the Waikato District Plan.

7. Proposed Conditions of NOR

- 7.1 To identify existing trees protected under the District Plan, and suitably manage potential adverse effects to those trees, a condition of consent requiring preparation of a Tree Protection Management Plan (TMP) has been recommended by the Requiring Authority as part of a suite of conditions. As set out in the information package submitted, the condition is only applicable to the Designations which currently have trees protected by District Plan provisions NOR and NOR.
- 7.2 Given the timeframe for the likely construction associated with some of the designations, it is considered that there is potential for trees to become protected between the time of designation and construction. This could occur through the growth of trees, or through changes in adjacent land zoning.
- 7.3 As such, it is considered that the condition for preparing a Tree Protection Management Plan should apply to all of the designations.
- 7.4 A condition is also proposed for the preparation of an Urban and Landscape Design Management Plan for each of the designations. The wording of the condition is considered suitable for ensuring that mitigation planting is carried out to a good standard.

8. Submissions

- 8.1 I have reviewed the submissions and did not note any that raised any significant issues regarding trees currently protected by DP rules.



9. Conclusions and Recommendations

- 9.1 Overall, there are no arboricultural reasons to oppose the NOR's.
- 9.2 The majority of the trees within the proposed designations are not protected by provisions of the District Plan.
- 9.3 Where the condition requiring provision of a Tree Management Plan have been applied, this will ensure that detailed design takes consideration of existing tree features. This condition should be applied to all of the designations, to allow for changes in tree stock and changes in land zoning.

Memo

To: Karen Bell, Stantec

CC: Joe McDougall, Central and South Planning, Plans and Place, Auckland Council
Ana Maria d'Aubert, Consents Manager, Waikato District Council

Date: 14 December 2023

Reference: SGA Pukekohe Arterials NoRs – Urban Design and Landscape Review

1 Introduction

- 1.1 I have undertaken a review of the Pukekohe Arterials NoRs 1 – 8, on behalf of Auckland Council and Waikato District Council (in relation to NoR 8 only), in relation to the urban design and landscape assessments lodged with the NoR.
- 1.2 I am an Urban Designer and Landscape Architect. I am a director of the consultancy RA Skidmore Urban Design Limited and have held this position for approximately twenty years.
- 1.3 I hold a Bachelor of Science degree from Canterbury University (1987), a Bachelor of Landscape Architecture (Hons) degree from Lincoln University (1990), and a Master of Built Environment (Urban Design) degree from Queensland University of Technology in Brisbane (1995).
- 1.4 I have approximately 28 years' professional experience, practising in both local government and the private sector. In these positions I have assisted with district plan preparation and I have assessed and reviewed a wide range of resource consent applications throughout the country. These assessments relate to a range of rural, residential and commercial proposals. I have also reviewed a broad range of transport related notices of requirement.
- 1.5 I regularly assist councils with policy and district plan development in relation to growth management, urban design, landscape, character and amenity matters. This includes reviewing proposed NoRs. By way of example, between 2019 and 2021 I assisted Auckland Council with a review of the package of NoRs proposed by the Supporting Growth Alliance (the "SGA") relating to Drury arterials.

- 1.6 I am an accredited independent hearing commissioner. I also regularly provide expert evidence in the Environment Court and I have appeared as the Court's witness in the past.
- 1.7 In writing this memo, I have reviewed the following documents:
- Urban Design Evaluation (September 2023) (“UDE”);
 - Landscape and Visual Effects Assessment (September 2023) (“LVEA”);
 - The proposed conditions for each NoR (as notified);
 - Submissions.
- 1.8 My review has also been informed by reference to: the AEE; the general arrangement layout plan for each NoR; and the Assessment of Operational Noise Effects . I note that the NoR is not limited to the design outcomes depicted in the general layout plans. However, these are helpful to understand the rationale for the NoR alignments and the extent of the corridors proposed.
- 1.9 I attended a project briefing and project-wide site visit on the 29th June 2023 prior to lodgement of the NoRs.

2 Technical Reports Overview

- 2.1 As set out in the Assessment of Environmental Effects (“AEE”), the NoRs seek to provide route protection for the transport network in and around Pukekohe. The need for these NoRs is driven by the rate and scale of committed development in the area, including the planned release of land for urban development by Auckland Council and the pressure from developers to accelerate urban growth.¹
- 2.2 Relevant to a consideration of urban design and landscape effects is the extended lapse timeframe of 20 years being sought for all the NoRs. The approach taken to the assessments provided to support the NoRs reflects the potentially long timeframe to implement the transport networks in environments that are likely to change significantly.
- 2.3 Within the Pukekohe Transport Network area there are a range of zones, which will influence the likely future environment relevant to the assessments. As set out in the AEE, where transport infrastructure is within Future Urban zones (“FUZ”), it is likely the construction of the infrastructure will occur ahead of, or in parallel to, the urbanisation of these areas. Accordingly, when considering the environment within which the effects of the construction and operation of the transport infrastructure is likely to occur, it is

¹ Section 3.4, p. 19, AEE

important to consider the likely future environment for specific NoR areas.² Where relevant, the urban land use patterns outlined in Auckland Council’s Structure Plans for the Pukekohe and Drury growth areas have been considered. The likely future environment assessments have also been guided by overlays within the Auckland Unitary Plan(Operative in Part) (“AUP:OP”) which identify features considered to be of high natural, cultural or heritage value.

Urban Design Evaluation

- 2.4 The UDE report sets out a clear and detailed analysis that, in my opinion, follows an appropriate methodology.
- 2.5 Section 1 of the report clearly identifies the purpose and scope of the assessment. Section 3 provides an overview of the proposed transport network covered by the 8 NoRs and largely summarises detail set out in the AEE.
- 2.6 Section 3 describes relevant documents that have informed the indicative design for the proposed transport network and the resulting NoRs. This includes:
- An evaluation against the SGA programme wide Te Tupu Ngātahi Design Framework (“Design Framework”);
 - The National Policy Statement on Urban Development 2020 (“NPS:UD”);
 - Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021;
 - At a local level, the AUP and the Waikato Regional Policy Statement (NoR 8 only), the operative Waikato District Plan (Franklin Section) (NoR 8 only) and the proposed Waikato District Plan (NoR 8 only).
- 2.7 Section 4 describes the existing and likely future environments for each of the NoRs using the approach set out in the AEE and described above.
- 2.8 Section 5 describes the methodology used for the evaluation, using the Design Framework as a way to structure the evaluation. Importantly, this section notes that the assessment goes beyond an assessment of effects, as required for the NoR process and identifies opportunities (that may be delivered by other parties) to achieve better urban outcomes relating to the transport network. The purpose of this is to identify where better transport and land use integration can be facilitated, resulting in better urban environments for future communities.

² Section 8.4, p.38, AEE

- 2.9 Section 6 sets out an assessment of urban design matters that are common to all the NoRs. This is followed by an assessment specific to each of the NoRs in Section 7.
- 2.10 Section 8 provides a summary of the assessment and recommendations of matters that should be addressed in an Urban and Landscape Design Management Plan (“ULDMP”) to be required for each of the NoRs through conditions but does not provide any comment about the content of the conditions proposed for each NoR.
- 2.11 The report is accompanied by two appendices. The first, Appendix A sets out in the Principles set out in the Design Framework. The second, Appendix B, contains maps for each of the NoRs spatially identifying the outcomes and opportunities identified in the assessment.

Landscape and Visual Effects Assessment

- 2.12 The LVEA also provides a clear and detailed analysis. In my opinion, the assessment methodology is consistent with the guidance provided in Tuia Pito Ora New Zealand Institute of Landscape Architects’ ‘Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines (2022) (“Te Tangi a te Manu”).
- 2.13 The Introduction section of the report (Section 1) sets out the purpose and structure of the report. In a similar vein to the UDE, Section 2 provides an overview of the proposed NoRs based on the description provided in the AEE.
- 2.14 Section 3 sets out the methodology used for the assessment and identifies the reference to various statutory and non-statutory documents in carrying out the assessment. The rating scale used both the assessment of landscape character effects and visual effects is consistent with that recommended in Te Tangi a te Manu. The assessment is divided into effects experienced at the construction phase and effects experienced at the operational phase (including proposed landscape mitigation measures). As the NoRs are for route protection and a long lapse time is proposed, it is difficult to determine the actual physical change that will occur both within the receiving environment and as a result of the construction of the transport network at the time of implementations. Assumptions made in the assessment are set out in Section 3.7. In relation to the timing of development and the character of the surrounding receiving environment, the assessment makes the assumption that the delivery of the transport network upgrades will likely occur at a similar time to development of the FUZ. Therefore, for NoRs that pass through FUZ zoned land, the assessment is made on the basis that the construction phase will occur in the existing environment (generally rural and urban fringe) and the operational phase will occur in the future urban environment. For those areas already urbanise or are planned to be in live urban zones, construction and operational phases are assessed as being in an urban environment. For areas with a rural zoning, construction and operation phases are assessed as being in a rural environment.

- 2.15 A description of the existing and future environment proximate to each of the NoRs is set out in Section 4. The descriptions are supported by a series of maps depicting the NoR boundaries overlaid on aerial photographs annotated with the AUP and WDP (for NoR 8) zones and relevant overlays. Photographs are also used to support the descriptions provided.
- 2.16 Section 5 identifies positive effects associated with and common to all the NoRs. Table 5-1 summarises which parts of each NoR relate to the different environments described above.
- 2.17 Section 6 contains the main assessment. It firstly provides a brief bullet point assessment of the types of effects common to all NoRs. These are addressed in more detail in relation to each of the proposed 8 NoRs. As noted above, for each NoR the assessment is divided into construction phase effects and operational phase effects, with an assessment of landscape character effects and visual effects provided for each. Each part of the assessment is summarised with a rating and included in a effects rating table.
- 2.18 Section 7 sets out recommendations to ensure adverse landscape effects are avoided, remedied or mitigated (general to all NoRs). These are organised in relation to construction effects and operational effects. The report recommends that the points are captured in a condition and used to inform the preparation of an ULDMP or Landscape Management Plan as the detailed design of the alignment is progressed. But it does not go on to provide any comment about the content of the conditions proposed for each NoR. In the following section I set out my review of the condition and make recommendations for amendments.

3 Key Issues - general

- 3.1 As noted above, I generally consider the NoRs are supported by robust urban design and landscape analysis. Section 6.1 of the UDA sets out an assessment of urban design matters common to all NoRs. Section 6.1 and 6.2 of the LVEA sets out a landscape assessment of construction effects and operational effects that relate to all NoRs. Having reviewed these and the matters raised in submissions, I consider there are a limited number of general issues that require further consideration.

Extent of Designation and Integration with Adjacent Land-use

- 3.2 The NoRs provide route protection for the intended upgrading of the arterial network. Actual works may not occur for some considerable time, with a 20-year lapse period being sought. While indicative designs have been prepared to inform the NoRs and the accompanying assessments of effects, they do not necessarily represent the final

design solution. The extent of the NoR boundaries enables flexibility to accommodate the outcomes sought for the road corridors and to accommodate the construction process. Condition 3 for each of the proposed designations requires the extent of the designation to be reviewed following completion of construction to identify areas no longer required for the on-going operation, maintenance, or mitigation of effects of the Project.

- 3.3 Given the extended timeframe for completion of works within the NoRs, this could present issues around the timing of development of adjacent land and achieving good integration between the upgraded streets provided for by the designations and adjacent properties. Ideally, construction of the new or upgraded streets would precede or at least be designed prior to urbanisation of surrounding land. However, as noted in the AEE, it is likely that urban development will occur adjacent to the proposed designations before the Project is implemented.³ This may result in a poor interface and integration between the urban environment and the adjacent street environment. I note that development is not precluded within the designation area with written approval from the requiring authority. However, as some uncertainty would remain regarding the area required for the street corridor and its final form, particularly ground levels, there remains a risk that poor integration could result. It is recommended that for each NoR the designation should occupy the minimum space necessary to accommodate the intended street corridor and to provide adequate space for ancillary construction areas.
- 3.4 Condition 10 for all the AT NoRs sets out requirements for a Land Use Integration Process (LIP). In my opinion this will go a considerable way to facilitating good communication between the requiring authority and surrounding land-owners as an appropriate mechanisms to enhance integration between projects. I note that a similar condition is not proposed for for the Waka Kotahi NoRs (2 and 8). The process required by this condition would also be beneficial in relation to these corridors (as discussed in the following section) and I recommend a LIP condition should be included.
- 3.5 Depending on the timing of the development of adjacent land, there is a risk of residual land following construction of the road corridor (such as areas required for construction layovers) will create redundant land parcels with limited scope to integrate well with surrounding areas. It would be helpful for the LIP to foreshadow the creation of these areas to facilitate suitable integration with adjacent development plans.
- 3.6 I note that the UDE recommends that “if practicable, opportunities should be explored at future detailed design stages to redefine and integrate residual land along the corridor frontage with the expected future land use function, for example the integration of works into the surrounding landscape and urban context”. I agree that this is an important consideration at the detailed design phase of the projects.

³ Section 11.13, p. 161, AEE

Land Modification and Integration with Surrounding Environment

- 3.7 In order to contribute to the functionality and character of the surrounding environment, the way landform modification required for the proposed transport network integrates with its surrounding context will be important. The UDE notes that “where new corridors are proposed, there are opportunities to further refine and minimise earthworks required as part of the future design stages”. It also recommends vertical integration adjacent to stream crossings and bridging structure to allow an appropriate transition and interface to adjacent built form where corridors are located in existing or future urban areas.⁴
- 3.8 I note that in urban environments, while the creation of extensive earth batters may be the most straight forward and cost-effective way to tie into existing land contours in the surrounding environment, they may frustrate the ability to achieve well-functioning urban environments through higher intensity of activity and the creation of positive interfaces between land-use and adjacent streets. The UDE makes a number of recommendations to consider different ways of achieving level changes at the detailed design phase in various locations for the various NoRs. I agree that the way levels transition should be suitable to the land-use pattern for the surrounding environment.
- 3.9 The LVEA also identifies that integration of development patterns (including topography and earthworks) will result in effects on landscape character⁵. In my opinion, landscape features such as streams and volcanic features exhibit particular sensitivity to change in surrounding landform. Careful consideration should be given to the detailed design of the transport corridors and the way changes in level are achieved in relation to these features.

Effects Resulting from Noise Mitigation Measures

- 3.10 The Assessment of Operational Noise Effects accompanying the NoRs has identified the likely need for noise mitigation beyond the use of low noise road surfaces for NoRs 2 and 8. Mitigation may include noise walls up to 2m high. The LVEA does not include any assessment of the potential landscape character and visual amenity effects resulting from such mitigation. While the proposed ULDMP requirements (Condition 10 for NoR 2 and 8) includes Clause (g)(D) “architectural and landscape treatment of noise barriers”, further analysis of the landscape effects resulting from such structures should be set out in evidence.

⁴ Point 1.3, p. 20, Urban Design Evaluation

⁵ Section 6.1, p. 62, Landscape and Visual Effects Assessment

Condition requiring Urban and Landscape Design Management Plan (ULDMP)

- 3.11 Each of the NoRs include a condition (Condition 11 for NoRs 1, 3, 4, 5, 6 and 7, and Condition 10 for NoR 2 and 8) that requires the preparation of a ULDMP prior to the start of construction for a stage of work.
- 3.12 The requirements of these conditions do not convey the specificity of recommendations made in both the UDE and the LVEA. It would be helpful for the witnesses to further explain how their recommendations are to be addressed. Given the route protection purpose of the NoRs for upgrading work that may not occur for some considerable time, I consider the generic nature of the conditions requiring the preparation of ULDMPs is generally appropriate. While not ‘place specific’, in my opinion, the requirements of the ULDMP are detailed and will enable relevant urban design and landscape considerations to be suitably addressed. However, I suggest a number of additions to address recommendations set out in the UDE⁶. In my opinion, sub-clause (f) could be helpfully expanded to add under (i):
- (ia) resolves any potential conflict between placemaking aspirations within local communities and the scale and operation of the Project.*
- (ib) enables buildings and spaces to positively address and integrate with the corridor.*
- 3.13 Appendix B of the UDE contains a series of Outcomes and Opportunities plans. These are helpful to spatially identify the recommendations made in the report. The plans also clearly identify and differentiate between recommended outcomes for the Project and associated opportunities that are not required to mitigate identified effects and may be implemented by other parties. I acknowledged that the construction within the designations may not occur for some time and there may be changes in the surrounding context. However, I consider these plans are very informative and, in my opinion, it would be helpful to reference these plans in the ULDMP condition. This could be achieved by amending sub clause (g) as follows:
- (g) With reference to the Outcomes and Opportunities plans included in Appendix B of the Urban Design Evaluation for the Notice of Requirement (September 2023), the ULDMP(s) shall include:.....
- 3.14 Section 7 of the LVEA sets out a number of recommendations in order to avoid, remedy or mitigate adverse landscape effects associated with the construction and operational phases of the Projects. In my opinion, the recommendation regarding the location and

⁶ Point 3.3, p. 23 Urban Design Evaluation

design of construction facilities is appropriate and should be captured in the ULDMP requirements⁷. Therefore, I recommend that sub-clause (f) is expanded to add:

Accommodates site compounds, construction yards, storage of construction machinery and any overburden in areas that are visually discrete (avoiding hilltops and ridgelines where practicable). As a minimum screening of these elements is required during the construction period.

4 NoR Specific Issues

- 4.1 In addition to the issues that are common to all NoRs discussed in Section 3, the following identifies issues specific to each NoR, having reviewed the UDE and LVEA. Comment is also provided on points raised in submissions.

NoR 1 – Drury West Arterial

- 4.2 Facilitating an active interface from adjacent land to the corridor is identified in the UDE as a key issue for resolution at the future design stages, together with refinement of the intersection design and scale⁸. I note that the extent of the designation boundary and the likely need for batter slopes (as depicted in the general arrangement layout plan) will present challenges to achieving this outcome, particularly adjacent to the ramping required to bridge the railway line and the extent and configuration of land proposed to tie into the Runciman Road roundabout.
- 4.3 As noted in the LVEA, the proposed alignment crosses multiple intermittent and permanent streams. The general arrangement plan indicates three bridge crossings. In my opinion, the requirements of the UDLMP are suitably robust to ensure the natural character values of the stream environments are maintained through the design of bridge structures and enhanced through mitigation planting. I agree with the assessment of landscape character and visual effects set out in relation to both the construction phase and the operational phase.

Submissions

- 4.4 I note that the corridor crosses the NIMT rail line and overlaps with the associated designation. The submission by KiwiRail supports the conditions relating to the requirements for the preparation of an UDLMP.

⁷ Section 7.1, p. 104, Landscape and Visual Effects Assessment

1.1 ⁸ Section 3.3, p. 29, Urban Design Evaluation

- 4.5 The submission by the McKean Family Trust raises concerns about the landscape and visual effects during construction and after development experienced from their property at 826 Runciman Road. Dense planting around the perimeter of this property will screen views toward the eastern extent of this road corridor where it ties in with the existing Runciman Road alignment. When considered in combination with the property's separation I consider adverse visual effects in relation to this NoR will be very low.

NoR 2 – Drury Pukekohe Link

- 4.6 NoR 2 is a Waka Kotahi designation. It is the longest and probably the most complex of the 8 designations, comprising four distinct segments that pass through a range of contexts. This is clearly described in both the UDE and the LVEA. The proposed designation will enable both upgrading of existing roads and new road alignments.
- 4.7 The proposed designation boundary is wide enough to provide flexibility to accommodate considerable earthworks. In particular, for Segment 1 (Drury South Connection) a large area of earthworks may be required in the vicinity of Ngakoroa Stream and at the intersections with Runciman Road and Burt Road. In my opinion, the requirements for the UDLMP are adequate to ensure a suitable design response is achieved. Given the likely continued rural zoning of the adjacent land to the South I consider the final road design will not create integration issues for future development of this land. As land to the north is zoned Future Urban between Burt Road and Runciman Road, particular care will be required to ensure a suitable interface is achieved.
- 4.8 For Segment 2 (SH22 Connection) a very wide corridor is proposed in the vicinity of Oira Creek and the crossing of the NIMT rail line to enable construction areas to be accommodated. The space within the designation will also provide space to enable mitigation works in relation to the Oira Creek environment. Given the likely continued rural zoning of the corridor and surrounding land, the extent of the designation corridor will not create issues around integrating with future adjacent land-use.
- 4.9 Similarly, Segment 3 (Drury – Paerata Link), passes through land that will likely remain in rural use. Largely running adjacent to and parallel with the NIMT rail line designation the final street design may result in redundant land between the two corridors. Further consideration should be given to how this land would be accessed and used.
- 4.10 Segment 4 (Paerata Arterial) will create the edge to the future urban environment immediately to the west. The northern portion of the designation will involve upgrading of existing streets with the southern portion comprising a new road alignment. At the northern end of the designation plans are well advanced for a new railway station (the Paerata Station) with likely future zoning accommodating urban intensity housing (THAB zone) immediately around this and transitioning to lower density housing (MHU). For this segment, ensuring an appropriate urban interface will be critical when

the road corridor is designed. The extent of the designation corridor, and requirements for extensive cut and fill, will present challenges to achieving a positive street interface. Further comment is made in response to submissions below.

Submissions

- 4.11 In addition to concerns raised about NoR 1, the submission by the McKean Family Trust raises concerns about the landscape and visual effects during construction and after development experienced from their property at 826 Runciman Road in relation to NoR2 (Segment 1). It would be helpful for the requiring authority landscape expert to provide an analysis of the visual effects experienced from this property in evidence.
- 4.12 A number of submissions question the route alignment in relation to the underlying topography and the resulting effects on existing properties, identifying loss of vegetation and light effects in the rural environment. These matters are addressed in both the UDE and LVEA. Additional analysis in relation to various submitter properties should be addressed in evidence.
- 4.13 The submission by KiwiRail supports the NoR and Condition 11 that sets out the requirements for an UDLMP. The submission by Paerata Farms raises a number of relevant urban design concerns, including the potential lack of integration with the Kiwirail concept plan for the Paerata train station, the creation of a 'no-man's land' adjacent to the northern roundabout in the vicinity of the station and potential poor integration of levels with a resulting implication on the area of land take required. Due to the large area of the designation and the long lapse period, the submission considers the designation will not enable a high quality urban environment to develop on the submitters landholding.
- 4.14 KiwiRail are well advanced with planning of the Paerata train station with construction currently underway. Further analysis should be provided in evidence to demonstrate how the proposed designation will ensure good integration with this important urban structuring infrastructure will be achieved. This includes a consideration of how level transitions can be achieved and surrounding land-use can be appropriately integrated. I note that unlike the AT NoRs, this NoR does not propose a condition setting out requirements for a Land Use Integration Process (LIP) (Condition 10 in NoRs 1, 3, 4, 5, 6 and 7). In my opinion, the requirements of the ULDMP set out in Condition 10 are not sufficient to address the fundamental integration concerns raised in this submission.

NoR 3 – Paerata Connections

- 4.15 NoR 3 is closely related to NoR 2 and provides local connections to the corridor to north and south of the Paerata train station with the northern connection crossing the NIMT rail line.

Submissions

- 4.16 The submissions by KiwiRail and Paerata Farms also relate to this NoR. Given the function and relationship of these local connections to the NoR 2 corridor, the issues raised above are also relevant to a consideration of this NoR. I note that Condition 10 (LIP) is proposed for this NoR. However, further analysis at this stage would be beneficial to demonstrate how the corridor will integrate with and contribute to the creation of an appropriate future urban environment in the area around the train station.

NoR 4 – Pukekohe North-East Arterial

- 4.17 NoR 4 will provide for a new road alignment providing a connection to the north east of Pukekohe. The existing and likely future environment is well described in the LVEA. The corridor passes through a complex landscape with an undulating topography including a number of streams and a volcanic tuff ring (not identified as and ONF or ONL in the AUP:OP). The alignment is proximate to an identified ONL (the Pukekohe East Tuff Ring) and a number of SEAs, with one extending into the designation area.
- 4.18 The existing land-use pattern includes a mix of rural and rural residential land-uses. In terms of the likely future environment, the Pukekohe-Paerata Structure Plan identifies a range of zones through the FUZ area including: Business: Light Industry, Business: Local Centre, and Residential, although the mid-section is expected to stay zoned Rural.
- 4.19 Formation of the route will require considerable land modification and structures to cross watercourses. I note the assessment of construction effects on landscape character and visual amenity set out in the LVEA as ranging from moderate-high to moderate. In my opinion, the requirements of the ULDM (Condition 11) are suitable to address the key issues relating to this NoR. This includes the design response to the various streams, landform modification and integration with adjacent land-use. As discussed in Section 3 above, the timing of development in the FUZ areas may present challenges to achieving good integration between the street environment and adjacent development. Condition 10 sets out a mechanism to facilitate discussion and co-ordination with adjacent property owners. I agree that when considering the likely future environment, the operational effects on the landscape character of the rural areas of the route will remain moderate adverse. For areas that are to be urbanised, with an appropriate design of the street corridor and its interface with adjacent land use, I agree that the adverse effects on the landscape character will be very low.

Submissions

- 4.20 The submission by Pukekohe Industrial Park and Storage questions the adequacy of the ULDM requirements to ensure an appropriate interface is created with the operational areas of commercial premises and suggests that further direction is required and suggests Condition 11(f) is expanded to ensure that effects on the

operation of commercial activities are appropriately managed. In my opinion, (f)(i) is adequate to enable appropriate consideration of the way appropriate integration is achieved. I also note the LIP requirements of Condition 10 to facilitate the creation of appropriate interfaces.

- 4.21 The submission by S. Ainsley notes support for the NoR and sets out the process to date for the design for residential development of the submitter's land adjacent to the roundabout at the southern end of the corridor (part of 87 and part of 131 Pukekohe East Road).

NoR 5 – Pukekohe South-East Arterial

- 4.22 NoR 5 comprises a combination of upgrading of existing road corridors and new corridors. With much of the corridor and its surrounding environment located within a FUZ zone, there will be considerable urban transformation in the area. This is signalled by the number of private plan changes in the area, with live zoning now confirmed in some areas (e.g. PC76). The characteristics of the existing and likely future environment is well described in the LVEA.
- 4.23 The LVEA notes that the alignment will require limited landform modification. However, the earthworks required to build up levels for crossing over the NIMT is noted. It is unclear from the assessment what height would be required to achieve suitable clearance of the rail corridor and Station Road and the associated landscape and visual effects that would be associated with this modification. While this portion of the alignment passes through an existing (west of the rail line) and likely future (east of the rail line) industrial area, which is less sensitive to visual change, it is also located adjacent to the Pukekohe Showground. It would be helpful to provide more detailed analysis in evidence. The UDE recommends that future design stages should address how the earthworks required provide vertical clearance of Station Road and the NIMT could be minimised, retained or otherwise configured to present an appropriate interface to the adjacent land uses⁹. I agree with that recommendation.
- 4.24 The underlying landform expresses former volcanic processes with the eastern and central sections of the alignment (spatially limited to Pukekohe East Road and Golding Road) located within the Roseville tuff ring south. This feature is not identified in the AUP:OP as an ONL or ONF. The eastern extent of the alignment extends into the edge of the Pukekohe East tuff ring. This feature is identified in the AUP:OP as an ONF. While the LVEA describes these features in Section 4.3.5 of the report, it does not provide an assessment of the landscape character effects in relation to the landscape values associated with these features. The relationship of various volcanic features in the wider area is depicted in Figure 4-3 of the LVEA. In my opinion, the existing street network provides modification to the volcanic landscape and the remnant features are

⁹ Section 7.5, P. 48, Urban Design Evaluation

not easily distinguished in the wider landscape. In my opinion, the proposed alignment will not diminish the landscape values derived from these features. The requirements of the UDLMP (Condition 11) provide the opportunity to reinforce the volcanic landscape values of the area through elements such as appropriate planting.

Submissions

- 4.25 A number of submissions, including those by EnviroNZ Services Ltd., S. Zheng and OMAC Ltd. and Next Generation Properties Ltd., express concerns about both the alignment and the wide extent of the designation footprint to provide flexibility to accommodate batter slopes, and the resulting implications for surrounding land use. This issue is discussed in Section 3 above.
- 4.26 The submission by Kevin Golding notes the location of mature native vegetation on the property at 97 Golding Road, including a 100 year old Kauri tree located within the designation boundary. The LVEA notes that the extent of vegetation removal in association with NoR 5 is likely to be limited to short sections along the existing road alignment, with the wider vegetation patterns remaining intact¹⁰. I note that the arboricultural review carried out by Arborlab for the Council has only identified vegetation within the road reserve as being protected in the AUP. However, further analysis of the vegetation identified and its contribution to the landscape values of the area and the effects on those values from removal of vegetation within the designation should be carried out and set out in evidence.
- 4.27 The submission by Aedifice Development No. 1 Ltd. raises concerns about the extent of the designation footprint in relation to the property at 2 and 19 Golding Road. This land has recently been live zoned as Residential: Mixed Housing Urban (“R: MHU”). The submission highlights the implication the designation will have on the ability to accommodate residential development in this area and considers the proposal will reduce the amenity of the neighbourhood rather than contributing to it. Further urban design and landscape analysis should be provided to demonstrate the implications of the designation footprint on future residential use of this property (having regard to the AUP Pukekohe East – Central Precinct Plan) and to demonstrate whether a smaller designation footprint can be achieved through an alternative intersection design than the one depicted in the general arrangement plans.
- 4.28 The submission by KiwiRail highlights potential design challenges to spanning the NIMT railway line. These design constraints should be taken into account when responding to the point raised above, requesting further assessment regarding requirements and effects associated with bridging the railway line and Station Road.

¹⁰ Section 6.3.5, p. 88

NoR 6 – Pukekohe South-West Upgrade

- 4.29 NoR 6 applies to small discrete areas within the existing Pukekohe street network to enable improved functionality. The established urban environment passes through industrial and residential areas.
- 4.30 The required upgrading works will largely be accommodated within the existing road reserve so, while there will be some change in character, the extent of change outside the existing corridor will be limited.
- 4.31 The proposed designation impacts on the site that accommodates the Nehru Hall (on the corner of Ward Street and Puni Road). The hall is a scheduled historic place. In addition to its heritage values, the building makes a contribution to the neighbourhood character. In my opinion, the requirements of the UDLMP enable suitable consideration to ensure an appropriate relationship between the street environment and this site is achieved.

Submissions

- 4.32 The submission by E. and B. McIntyre raises concerns about the effect of the proposed designation boundary location on the amenity of their property at 1 Ward Street and particularly the view from their dwelling. The submission seeks a reconsideration of the intersection design to avoid the requirement to widen the road corridor. A more detailed analysis of the amenity effects in relation to this property should be set out in evidence.

NoR 7 – Pukekohe North-West Arterial

- 4.33 This designation ties into and upgrades existing roads (Helvetia Road and Butcher Road) at either end of the alignment with a new corridor created between. While currently accommodating a mix of rural, rural residential and light industrial activities, the corridor is fully located within a FUZ zone and will likely undergo urban transformation.
- 4.34 The UDE notes that a key focus area within the designation that requires further resolution in future design stages relates to the corridor sections within areas anticipated for future residential use. It highlights the issue presented by areas where significant earthworks are proposed, noting the need for transitions and consideration of the interfaces created with future residential and industrial land uses¹¹. In relation to this point, I note that the designation is particularly wide in areas to accommodate significant batter slopes. In relation to the future urban environment and the resulting visual effects resulting from the road alignment and extent of land modification required,

¹¹ Section 7.7, p.59, Urban Design Evaluation

the LVEA recommends that the design should work and integrate with the surrounding topography and improved visual amenity and user experience associated with the corridor.¹²

- 4.35 As noted in the LVEA, the southern end of Helvetia Road is located within the Helvetia tuff ring. However, this volcanic landform is not identified as an ONF or ONL in the AUP:OP. While the construction effects on landscape character notes the requirements for earthworks (fill) along the Helvetia Road alignment, there is no assessment provided in relation to the effects on this volcanic landform. Given the existing modified nature of the landform, I consider the contribution it makes to the landscape character of the existing environment will not be significantly affected by works enabled by the designation.

Submissions

- 4.36 The submission by D. and L. Morrison raises concerns about the ability to develop their property at 17 and 17a Butcher Road, in accordance with the likely future urban zoning as indicated in the Pukekohe-Paerata Structure Plan. Similar concerns are raised by D. and T. Polwart who own 36 and 62 Butcher Road. Further urban design analysis of the potential future use of properties in relation to the designation boundary should be set out in evidence.
- 4.37 The submission by R. Burns raises concerns about the effects of the designation alignment on the current use of his farm and associated dwelling at 106 Beatty Road. Further detailed assessment of the visual effects experienced from the dwelling on this property should be set out in evidence. In relation to future development of the property, I agree with the observation in the submission that the appropriate edge between residential and business zoning would be along the new road alignment.

NoR 8 – Mill Road and Pukekohe East Upgrade

- 4.38 NoR 8 is a Waka Kotahi designation that is proposed to provide a strategic connection between Auckland and Waikato and from State Highway 1 to Pukekohe urban areas for general traffic and freight, and providing an active mode connection. It involves an upgrade of Pukekohe East Road and Mill Road. This NoR interfaces with NoR4 (Pukekohe North East Arterial) and Nor 5 (Pukekohe South East Arterial). The Auckland/Waikato district boundary is located along the central portion of the NoR.
- 4.39 As noted in the LVEA, the proposed alignment will require land modification and associated vegetation removal to achieve a widening of the existing road corridor. The existing road has established a modification to the underlying landform. This includes the Pukekohe East tuff ring (identified as an ONF within the AUP:OP) that extends to

¹² Section 6.3.7, p. 96, Landscape and Visual Effects Assessment

the north and south of Pukekohe East Road and is a distinctive geological and topographical feature. The existing road alignment crosses the southern extent of the ONF overlay. I agree with the assessment set out in the LVEA¹³ in relation to the potential landscape effects resulting from the formation of the road within the designation corridor on this feature. In my opinion, the requirements of the UDLMP (Condition 11) are suitable and will need to be carefully considered to ensure an appropriate design response is achieved in this area. I agree with the overall conclusion that moderate temporary adverse effects on the landscape character of the area will result during the construction phase of the project. Further assessment in relation to scheduled vegetation is set out in the Arboricultural Assessment.

- 4.40 The proposed designation boundary is particularly wide in the area proposed to accommodate the Mill Road wetland stormwater facility. The LVEA notes that construction of the wetland will require cut and fill. However, the assessment considers its formation will not introduce an unexpected element into the rural environment¹⁴. In my opinion, suitable design of the wetland, together with associated planting (as required by the ULDMP), has the potential to enhance the landscape values of the existing wetland and its relationship to existing vegetation within the Mill Road Esplanade Reserve to the north.
- 4.41 In relation to visual effects experienced during construction, the LVEA notes that for properties along Pukekohe East Road and Mill Road that have houses near the existing roads, removal of existing vegetation will open up views towards the works, resulting in adverse visual effects (assessed in the LVEA as low-moderate reducing to low during the operational phase as mitigation planting becomes established).

Submissions

- 4.42 The submission by R. Cunningham raises concerns about the effect of visual pollution on their property at 80 Mill Road. This property is located in the Waikato District. The dwelling on this property has a generous setback from the proposed designation. However, a more detailed assessment of visual effects experienced from this property should be set out in evidence.

¹³ Section 6.3.8, p. 97, Landscape and Visual Effects Assessment

¹⁴ Section 6.3.8, p. 99, *ibid.*

5 Conclusions

- 5.1 The proposed suite of 8 road designations will provide for significant upgrading of the transport network around and through the rapidly urbanising Drury, Paerata and Pukekohe. The key objective of the Project is to protect land for the future implementation of the required strategic transport corridors/infrastructure.
- 5.2 As the requiring authorities (AT and WK) envisage that the network will be delivered over a considerable timeframe, an extended lapse period of 20 years is being sought.
- 5.3 The NoRs are supported by a detailed UDE and LVEA that follow suitable methodologies. In relation to urban design and landscape considerations (which overlap in their scope) my review identifies two key issues common to all the NoRs. The above review discusses and highlights the issues relating to the extended lapse period being sought and the extent of the designations proposed in order to provide flexibility for route protection and the implications this will have on achieving integration with surrounding land use. The second, and related issue, is the extent and scale of earthworks required to achieve the proposed transport routes and the implication this will have on achieving good integration with surrounding (particularly) urban environments. While the AT NoRs include a condition requiring a LIP, the two Waka Kotahi NoRs do not. I recommend that such a condition is also included for NoR 2 and 8 as the issue of achieving good integration is also relevant to these two corridors.
- 5.4 Given the route protection purpose of the designations, the primary method for addressing the issues raised is the requirements for the preparation of UDLMPs for the NoRs as detailed proposals are designed. The suitability of this requirement is discussed in the review.
- 5.5 The review also addresses considerations specific to each of the NoRs having regard to matters raised in submissions. Requests for further detailed analysis to be provided in evidence is set out in the discussion for each NoR.



Rebecca Skidmore

Urban Designer/Landscape Architect

14 December 2023

Auckland Council memorandum (technical specialist report to contribute towards Council's section 42A hearing report)

14 December 2023

To: Karen Bell, Consultant Planner, Plans and Places, Auckland Council
From: Trent Sunich, Consultant Stormwater Technical Specialist
Cc: Joe McDougall, Policy Planner, Central and South Planning, Plans and Places

Subject: Pukekohe Transport Network Notices of Requirement – Stormwater and Flood Hazard Technical Assessment

1.0 Introduction

This memorandum summarises the findings of my review on behalf of Plans and Places of the Auckland Council for the Pukekohe Transport Network Notices of Requirement (the NoRs). My assessment considers flood hazard effects during construction as well as the long-term effects of operating the arterial routes. Where applicable I have also sought advice from Healthy Waters specialists regarding the suitability of the flood hazard assessment and use of the flood hazard models and prediction tools and the proposed designation conditions.

A section of NoR 1 also passes through the Waikato District. I have assessed and reported on this in a separate memorandum to the Waikato District Council.

Where appropriate I have also commented on management of operational stormwater discharges from the project, however this matter is largely out of scope currently and will be subject to future resource consent applications and assessment reflecting the stormwater management related rule sets in the Auckland Unitary Plan (AUP) or future equivalent planning frameworks. Notwithstanding this it is important to consider that suitable land area will be available within the designation to construct and operate the stormwater management devices receiving runoff from the carriageway impervious surfaces.

My involvement in the project has been from June 2023 where I was commissioned to review the relevant reports for the NoRs, any information requests/responses, and review/assess the relevant submissions culminating in the findings of this memorandum.

I hold a Bachelor of Technology (Environmental) which I obtained from the Unitec Institute of Technology in 2004. I have 20 years plus experience in the field of natural resource management and environmental engineering. My expertise is in integrated catchment management planning, flood hazard assessment, stormwater quality management, and assessing associated development related stormwater effects where previously I have held roles with the Auckland Regional Council and URS New Zealand Limited. I am currently employed by SLR Consulting (formerly 4Sight) as a Principal Environmental Consultant. I have reviewed and reported on the Warkworth to Wellsford motorway project Notice of Requirement on behalf of Healthy Waters who the Auckland Council's stormwater network operator. I have also been the reporting stormwater technical specialist to Plan and Places of the Auckland Council for the proposed private plan changes 4, 49 and 50 and the Drury NoRs 1, 2, 3.

In writing this memo, I have reviewed the following documents:

- Pukekohe Transport Network Assessment of Effects on the Environment, September 2023, Version 1
- Pukekohe Transport Network Assessment of Flood, Hazard Effects, September 2023, Version 1
- NoR 1 – Conditions notified
- General Arrangement Layout Plans NoR 1, 2, 3 notified
- Relevant public submissions.

2.0 Proposed Projects and Flood Hazard Assessment

□

As described by the Requiring Authority (Auckland Transport and Waka Kotahi) eight separate notices of requirement are sought to designate land for the purposes of constructing and operating arterial routes in and around the Pukekohe area to service protected growth in that part of the Auckland Region and will include provision for improved walking and cycling, public transport, and general traffic connections. The NORs are

- NoR 1 Drury West Arterial A new transport corridor with active mode facilities in Drury West extending south from the intersection of SH22 and Jesmond Road to the edge of the Future Urban Zone near Runciman Road, Drury.
- NoR 2 Drury Pukekohe Link A new state highway including a shared path. It includes sections of new and upgrades of existing transport corridors from Great South Road, Drury in the north east, connecting to State Highway 22 in the west, and the area in the vicinity of Sim Road Cape Hill Road, Pukekohe in the south.
- NoR 3 Paerata Connections One new connection between the existing Sim Road south and the Paerata Rail Station and second new connection between the two extents of Sim Road across the NIMT.
- NoR 4 Pukekohe North West Arterial A new transport corridor including active modes from SH22, Paerata in the north west to Pukekohe East Road, Pukekohe in the south east.
- NoR 5 Pukekohe South West Arterial A new and upgraded transport corridor in Pukekohe including active mode facilities. It upgrades part of Pukekohe East Road and Golding Road and a new connection between Golding Road north of Royal Doulton Drive and to Svendsen Road across Station Road and the NIMT.
- NoR 6 Pukekohe South West Upgrade The upgrade of specific intersections and the regrade of specific driveways on Nelson Street, Ward Street, West Street and Helvetia Road for active mode facilities.
- NoR 7 Pukekohe North West Arterial The upgrade of Helvetia Road, Pukekohe in the south west and a new corridor from Helvetia Road to SH22 Paerata in the north east including active mode facilities.
- NoR 8 Mill Road and Pukekohe East Road Upgrade An upgrade of Mill Road Bombay in the east for additional vehicles lanes and a shared path and Pukekohe East Road, Pukekohe in the west for a shared path.

Assessment of flood hazard during construction and post development for each of the NoRs has been documented in the report entitled 'Pukekohe Transport Network Assessment of Effects on the Environment' ('the Flood Hazard Report'). A precis of the local receiving environments, flood hazard assessment methodology and findings documented by the Requiring Authority's engineering consultant is detailed in the following subsections. This information has informed my assessment in the later sections of the report and has assisted with responding to the relevant submissions.

2.1 Catchment Overviews

For geographical context, the NoRs are situated within four stormwater catchments being Ngakoroa Stream, Oira Stream, Whangapouri Stream and Tūtaenui Stream. The Tūtaenui Stream catchment ultimately flows to the Waikato River, while the remaining three catchments drain to the Manukau Harbour. An overview of the catchment is as follows

- The Ngakoroa Stream covers approximately 4,000 ha in total catchment area. The Ngakoroa Stream includes a large tributary which splits from the main branch in the Runciman area and extends south for approximately one third of the catchment.
- Oira Creek catchment covers approximately 2,043 ha in total. This catchment extends from the northern side of the Pukekohe East Tuff Crater in the upper catchment and flows north along the eastern side of Paerata. Oira Creek flows into Drury Creek before discharging to Manukau Harbour.
- Whangapouri Creek catchment covers an area of approximately 1,270 ha including most of the Pukekohe urban area. The upper catchment includes Future Urban Zone and lower catchment is Rural zone. The Whangapouri Stream catchment includes heavily modified watercourses – both within Pukekohe and modified rural areas e.g. agricultural land.

- The Pukekohe-Tutaenui catchment includes covers an area approximately 2,09 ha and flows north to south into Whakapipi Stream before discharging into the Waikato River. The NoR routes and respective catchments are listed in the following table

Catchment	NoR Route
Ngakoroa Stream	NoR 1, NoR 2, NoR 3
Oira Creek	NoR 2, NoR 3, NoR 4
Whangapouri Stream	NoR 2, NoR 3, NoR 4, NoR 5, NoR 6, NoR 7, NoR 8
Tutaenui Stream	NoR 4, NoR 5, NoR 6, NoR 7

2.2 Flood Hazard Determination and Risk Assessment

In the context of constructing and operating each of the NoR routes, the Requiring Authority's engineering consultant has concluded that flood hazard effects may include changes to the flood freeboard to existing habitable buildings, overland flow paths and flood prone areas, flood levels on developable land in the FUZ, and the ability to access property by residents and emergency vehicles.

In order to assess these flood hazard effects, a consistent methodology was applied for each NoR route where each step is summarised as follows

- Desktop assessment to identify potential flooding locations, namely
 - Existing buildings that are near within the existing flood plains.
 - Where the Project involves work near stream crossings, flood plains and major overland flow paths.
 - Flood modelling of the pre-development terrain using the following
 - the existing terrain using Maximum Probable Development (MPD) development
 - 100 year average recurrence interval (ARI) plus climate change rainfall (2.0% increase) and
 - 100 year (ARI) plus climate change rainfall (3.0% increase)
- Model results were used to identify flood water levels $\geq 0.05\text{m}$ for the future 100 year flood event without the proposed project works modelled
- Inspection of the flood extent maps to identify flooding effects, including
 - At key cross drainage locations such as culverts and where there are noticeable deep flood levels, consideration was given to flood hazard issues.
 - Properties and buildings with habitable floors showing potential to flooding hazard through flood extent within the existing building footprints.
- A sensitivity analysis to assess the potential impact of climate change on the results.

This assessment focused on whether the designation area is large enough for a future road design to meet the proposed conditions. To date flood modelling has been limited to using the pre-development state only (2.0% and 3.0% climate change scenarios where applicable) with an indicative road design and designation layout. The result of this modelling was used to identify areas where the flood hazard is presently a risk and where the designation may need to widen to consider extent for mitigation.

2.3 Flood Hazard Model Outputs, Risk Assessment and Proposed Outcomes

In assessing the flood model results, the Requiring Authority's engineering consultant has developed a flood risk rating which was determined using flood depth from the model outputs to identify where there is an existing flood risk and hence where the proposed project works could exacerbate flooding. Flood risk was assessed using the following criteria and has been used to identify risk to existing properties along with a corresponding risk rating. The findings of the assessments, summary of mitigation measures proposed and associated proposed NoR conditions are presented in the following subsections for each NoR.

I have highlighted the moderate and high risk model results and included commentary of potential mitigation options later in this memorandum.

Overall Flood Risk	Negligible		Low		Moderate		High
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Flood depth / land use	Less Vulnerable e.g. open space, rural land (not in FUZ)	Moderately Vulnerable e.g. commercial and industrial properties	Highly Vulnerable e.g. dwellings, educational facilities
Negligible (flood depth < 0.05 m on land and freeboard >0.5m to buildings)			
Low (flood depth 0.05 m to 0.15 m on land and freeboard <0.5m to buildings)			
Moderate (flood depth 0.15 m to 0.5 m on land and No freeboard to buildings)			
High (flood depth > 0.5m on land and No freeboard to buildings)			

Utilising the flood hazard modelling information and associated risk assessment, an outcome focused approach to flood hazard management which are listed as follows and reflected in the proposed NoR conditions

- No increase in flood levels in a 100 AEP event for existing authorised habitable floors that are already subject to flooding or have a freeboard less than 200mm
- No more than a 10% reduction in freeboard in a 100 AEP event for existing authorised habitable floors with a freeboard of over 200mm
- No increase in 100 AEP flood levels for existing authorised community, commercial, industrial and network utility building floors that are already subject to flooding
- No more than a 10% reduction in freeboard in a 100 AEP event for existing authorised community, commercial, industrial and network utility building floors
- No increase of more than 100mm in flood level in a 100 AEP event on land zoned for urban or future urban development where there is no existing dwelling
- No new flood prone areas
- No more than a 10% average increase of flood hazard (defined as flow depth times velocity) for main access to authorised habitable dwellings existing at time the Outline Plan is submitted. The assessment shall be undertaken for the 100, 200, 500 and 1000 AEP rainfall events.
- Compliance shall be demonstrated in the Outline Plan, which shall include flood modelling of the pre-Project and post-Project 100 and 1000 AEP flood levels for Maximum Probable Development land use and including climate change

Mitigation measures to achieve the outcomes are anticipated to comprise the following

- Size culverts and bridges to meet proposed conditions on flood hazard outcomes.
- No attenuation in wetlands in the lower half of the catchment within the Project works are located.
- Attenuation for the 10yr and 100yr where wetlands are located in the upper half of the larger catchment.
- Provide diversion channels at the toe of fill embankments to prevent ponding.
- Offset flood volume displacement effects of filling in the floodplain.
- Maintain 200mm freeboard to new bridge soffits using the 100-year ARI flood level with 3.0

- Climate change hydrology.
- Extend culverts at the same diameter and replace culverts at the same diameter.
- Avoid lifting the crown of the road to prevent adverse effects upstream.
- Avoid lowering the road crown to cause effects downstream.

2.4 NoR 1: Drury West Arterial

NoR 1 is a new road connection from SH22 in the north, over the North Island Main Trunk (NIMT) Railway line, into a roundabout on Burt Road and terminating at the Drury to Pukekohe Link NoR 2. The catchment is rural at present with the upstream catchment undeveloped and mainly pervious. The new road alignment crosses several overland flow paths and will include some earthworks filling in floodplain areas. The existing flooding is most prevalent toward the south of the NoR where the new road will cross the main branch of the Ngakoroa Stream. The future environment is planned to be fully developed as urban under the Future Urban Zone (FUZ) provisions of the Auckland Unitary Plan – Operative in part (AUP(OP).

Key features of the proposed road include the following:

- NoR 1 is a 2.5km new transport corridor extending south from the intersection of SH22 and Jesmond Road to the proposed Drury to Pukekohe Link (NoR 2).
- Three new bridges are proposed over existing NIMT rail line, and two tributaries of the Ngakoroa Stream.
- Three new stormwater wetlands are proposed and new culverts and swales.

Flood Hazard Summary

The flood hazards from the 100-year ARI flood with a 2.0°C climate change adjustment to rainfall produces a mostly high flood risk in the floodplains surrounding the Ngakoroa Stream and included crossing of minor tributaries by NoR 1. Of the several flow path crossings, two areas (refer figure below) indicate moderate and high risk under current scenarios, with the remaining risk profiles being assessed as negligible under both climate change scenarios (2.0°C and 3.0°C).

2	110 Karaka Road, Drury	Agricultural land in the FUZ invert level 15.00m RL	Ngakoroa Train Station Park and Ride	2.1° CC: 15.20m RL 3.8° CC: 15.35m RL	Some moderate existing risk and negligible future risk
5 and 6	Ngakoroa Stream channel level RL 7.1m RL	Ngakoroa Stream Floodplain	Floodplain in the FUZ	2.1° CC: 10.20m RL 3.8° CC: 10.36m RL	High existing and future risk in floodplain, negligible existing and future risk out of floodplain.

Figure 1: NoR 1 Risk Areas

2.5 NoR 2: Drury – Pukekohe Link

NoR 2 is a new connection between Great South Road, Drury in the north, to a new connection north of Pukekohe (NoR 4 – Pukekohe North East Arterial). The alignment crosses eight overland flowpaths and will include some earthworks filling in floodplain areas. The existing flood prone areas are at the major stream crossings in the South Drury Connection, the State Highway 22 Connection, and the Drury Paerata Link. The Paerata Arterial section follows a terrain ridgeline and therefore has no integration with floodplains and no need for culverts.

The future environment is planned to be FUZ to the north and west of the NoR2 alignment with a gap between the FUZ areas in the middle.

Key features of the proposed road include the following:

- NoR 2 provides a north south strategic corridor with two general traffic lanes proposed and active transport facilities on one side of the corridor. The total length of the NoR is 10.1km.
- A 24m wide cross section is proposed with two lanes for general traffic, with walking and cycling on one side of the corridor.
- Three new bridges are proposed over tributaries of the Ngakoroa Stream.
- Two new bridges are proposed over the Oria Creek and NIMT.
- Two bridges are proposed over tributaries of the Oira Creek.
- A series of wetlands, swales and culverts.

Flood Hazard Summary

Drury – Pukekohe Link flood hazards from the 100 year ARI flood with a 2.0 climate change adjustment to rainfall will produce a mostly negligible flood risk due to the mostly uninhabited land upstream of flow path crossings. Regarding the findings at Point 3 detailed in the figure below the commercial and residential buildings are currently in the floodplain and the future amount of filling in the floodplain may generate a displacement effect and increase flood levels locally.

The effects of using a 3.0 climate change adjusted rainfall pattern compared to the 2.0 climate change pattern shows deeper flood depths in all eight flow path crossings for the NoR 2 road alignment.

3	767 Runciman Road, Site level RL 8.92m	Residential dwelling in Rural Zone. Working agricultural and horticultural land uses with >0.5m depth	No change expected, Rural land use	2.1° CC: 9.73m RL 3.8° CC: 9.91m RL	Moderate existing and future risk to dwellings with <500mm freeboard and rural land with >0.5m depth.
3	763B Runciman Road, Site level RL 9.03m	Residential dwelling and lifestyle block in the Rural - Countryside Living Zone.	No change expected, Rural land use	2.1° CC: 9.75m RL 3.8° CC: 9.92m RL	Moderate existing and future risk to dwellings with <500mm freeboard and rural land with >0.5m depth.

Figure 2: NoR 2 Risk Areas

2.6 NOR 3: Paerata Connections

The Paerata Connections consist of two new road connections called NoR 3.1 Northern Paerata Link and NoR 3.2 Southern Paerata Link. The catchments for NoR 3 are both small sub catchments to the Whangapouri Stream. They contain rural land uses and some dwellings along Sim Road.

The Northern Link (NoR 3.1) does not cross any overland flowpaths. The Southern Link (NoR 3.2) crosses a single flow path. A culvert for this flow path has been designed and consented as part of the KiwiRail Paerata Station access road. The Paerata Connections (NoR 3) do not include earthworks filling in floodplain areas.

Key features of the proposed road include the following

- The Sim to Sim Connection segment provides a new connection of approximately 400m between the two extents of Sim Road over the railway (NIMT)
- The Paerata Rail Station Connection segment provides a new transport corridor approximately 330m in length between the Paerata Rail Station and NoR 2

- One bridge is proposed over the NIMT to connect the two extents of Sim Road for the Sim to Sim Connection segment.
- One new stormwater wetland is proposed (shared with NoR 2) and a new culvert.

Flood Hazard Summary

The NoR 3 flood hazards from the 100-year ARI flood with a 2.0°C climate change adjustment to rainfall only crosses a single flow path. The land uses in proximity of NoR 3 are rural. Therefore, a negligible flood risk exists to upstream land. The modelled 3.0°C climate change scenario produced an overall higher flood level. However, the flood risk rating will remain negligible based on the land use being agricultural and no buildings in the vicinity.

2.7 NOR 4: Pukekohe North-East Arterial

NoR 4 connects Paerata Road in the west, to Pukekohe East Road in the south. The catchments for NoR 4 are in the Whangapouri Stream at either end and in the Oira Stream catchment through the mid-section. The route passes through rural land uses located in the FUZ and part is within the rural zone. The NoR 4 route crosses seven streams. These natural streams are located through the low elevation terrain in pastoral farmland. Each stream will need a bridge or a culvert to manage flows through the road crossing earthworks.

The environment is FUZ land with a section of mixed rural zone in the mid-section. As is stated in the Flood Hazard Report, the FUZ development is expected to avoid development in the stream areas and include green spaces as recreation parks and sporting fields.

Key features of the proposed road include the following:

- A 24m wide cross section is proposed with 2 lanes for general traffic and walking and cycling proposed on both or one side of the corridor.
- Seven bridges are proposed over the Whangapouri Creek, the NIMT, and other unnamed streams and tributaries.
- Six new stormwater wetlands are proposed and new culverts.

Flood Hazard Summary

The commercial and residential buildings at Point 1 detailed in the figure below are very close to the floodplain with the access to 1221 Paerata Road showing as flooded despite the building not showing as flooded. If these buildings are still present in the future at detailed design, there should be no increase to existing flood levels and no decrease in freeboard.

The residential buildings at points 4, 5 and 6 are located on terrain well above the adjacent streams, the project works will not likely have any influence on these properties.

The effects of using a 3.0°C climate change adjusted rainfall pattern compared to the 2.0°C climate change pattern shows deeper flood depths for points 2 through 6. The water depth at point 4 only increased by around 10mm mainly due to the weir present in the channel that controls flows and depths to this location.

The changes in flood depth at the other locations are minor and are a negligible flood risk to upstream properties. The 3.0°C climate change flood depth at point 1 would begin to flood the residential dwelling at 1221 Paerata Road and the risk rating would then change to from moderate to high.

1	1221 Paerata Road building floor level: 43.5m RL	Residential building in the FUZ	Future Urban Development in the FUZ	2.1° CC: 43.5m RL 3.8° CC: 43.72m RL	Existing moderate risk to dwelling, freeboard <0.5m. Future low risk to dwellings in FUZ.
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Figure 3: NoR 4 Risk Areas

2.8 NoR 5: Pukekohe South-East Arterial

NoR □ Pukekohe □ast Road in the east, to Svendsen Road in the south. The alignment passes through the Whangapouri Stream catchment in the northern half then through the Tatuanui Stream catchment in the southern half. The route is located in the FUZ at Pukekohe □ast Road, Golding Road and the new section of road between Golding Road and Station Road. The new section of road crosses Station Road and the NIMT to connect at Svendsen and Crosbie Roads in the existing urban area in Pukekohe. NoR □ crosses four □overland flow paths. Key features of the proposed road include the following □

- A 24m wide cross section is proposed with two lanes for general traffic with walking and cycling on the southern side of the corridor on Pukekohe □ast Road and on both sides for the remainder of the corridor.
- One bridge is proposed crossing Station Road and the NIMT.
- Five new stormwater wetlands are proposed and new and upgraded culverts.

Flood Hazard Summary

The land uses upstream of Points □, 2 and 3 □refer figure below□ contain dwellings nearby that may be sub□ect to flood effects if the upstream flood level caused by the NoR □ alignment is not adequately managed. Future buildings nearby will be considered during future design stages to meet the flood hazard condition proposed on the NoR. The buildings in the floodplain along Station Road at Point 3 □refer figure below□ are flooded due to the constrictive nature of the railway line and the drainage beneath. Additionally, earthworks in this floodplain may e□acerbate flooding on these properties. A longer bridge or compensatory earthworks may be needed to avoid worsening flood effects on these properties. The designation e□tent is sufficient to find a solution to meet the designation conditions being sought.

Flooding at Point 4 □refer figure below□ will likely remain unchanged as a result of the works. If adverse effects are found at this location, the effects can be managed with a channel and pipe network within the designation. The 3.□ climate change scenario has not been simulated for this catchment and the Auckland Council GIS does not provide information on this event at this location. As noted in previous sections the flood levels will likely increase by □00mm to 400mm as a result. The moderate risk locations would likely become high risk and low risk would become moderate risks.

2	65 Golding Road, building floor level: 59.4m RL	Residential Building in the FUZ	Future Urban Development in the FUZ	2.1° CC: 58.6m RL 3.8° CC: 59.6m RL	Moderate existing and future risk
3	124 Station Road, building floor levels: 58.0m RL RL	Residential Buildings in the FUZ	Future Urban Development in the FUZ	2.1° CC: 57.8m RL	Moderate existing and future risk
3	150 Station Road, building floor levels: 56.5m RL RL	Residential Buildings in the FUZ	Future Urban Development in the FUZ	2.1° CC: 57.8m RL	High risk existing and future risk
3	170 Station Road, building floor levels: 58.0m RL RL	Residential Buildings in the FUZ	Future Urban Development in the FUZ	2.1° CC: 57.8m RL	Moderate existing and future risk
3	194 Station Road, building floor levels: 58.2m RL RL	Residential Buildings in the FUZ	Future Urban Development in the FUZ	2.1° CC: 57.8m RL	Low risk existing and future risk

4	15 Austen Place, building floor levels: 55.0m RL RL	Industrial Buildings in Business - Light Industry Zone	Future Urban Development in the FUZ	2.1° CC: 55.0m RL	Moderate existing and future risk
4	44-46 Crosbie Road, building floor levels: 55.0m RL RL	Industrial Buildings in Business - Light Industry Zone	Future Urban Development in the FUZ	2.1° CC: 55.0m RL	Moderate existing and future risk

Figure 4: NoR 5 Risk Areas

2.9 NOR 6: Pukekohe South-West Upgrade

NoR 6 is an active mode upgrade of existing roads in the existing urban area of Pukekohe and includes small, isolated areas of designation. NoR 6 is mostly in the Tatuanui Stream and Whangapouri Stream catchments. The alignment indicates small parcels of land where required. This land is needed primarily for localised areas of road widening and has no flood effect component for assessment.

Flood Hazard Summary

NoR 6 includes designated areas for an active mode upgrade and driveway regrading. No changes to flooding are expected.

2.10 NoR 7: Pukekohe North-West Arterial

NoR 7 upgrades Helvetia Road in the south and provides a new section of road between Helvetia/Gun Club Heights Roads to Paerata Road in the north-east. NoR 7 is entirely in the Whangapouri Stream catchment and within the FUZ.

The NoR 7 route crosses seven overland flow path. These flow paths are small headwater catchments to the Whangapouri Stream. Each flow path, except 1, 2 and 3, have culverts under an existing road. The flow paths 1, 2, 4 and 7 will require a lengthened or upgraded culvert capacity to manage the larger wide, higher road embankment. The future environment will urbanise as FUZ is shown on both sides of the NoR 7 alignment.

Key features of the proposed road include the following:

- A 24m wide cross section is proposed with two lanes for general traffic and walking and cycling on both sides of the corridor.
- No bridges are proposed.
- Two new stormwater wetlands are proposed and new and upgraded culverts.

Flood Hazard Summary

The NoR 7 flood hazards have been modelled in the Whangapouri Stream catchment for the 3.0° climate change scenario and the Auckland Council GIS floodplains have been used to assess the flood hazards for 2.0° climate change scenario. At points 2, 3 and 4, the upstream railway line culverts controls the headwater and therefore the flood risk to the upstream properties. The design proposed at these locations would include new culverts with the same diameter. This would maintain the same flowrate and not cause new or exacerbate upstream flood risk.

Land uses upstream of points 1, 4, 5 and 7 contain dwellings nearby that may be subject to flood effects if the upstream flood level caused by the NoR 7 alignment is not adequately managed. Sizing of culverts and bridges will need to meet the flood hazard conditions on the NoR. This is best undertaken at future design stages and will, in part, depend on the changes in land use and construction of new buildings at the time the road alignment is developed further for construction.

There is flooding at 24 Helvetia Road which is caused by an undersized culvert beneath Helvetia Road. There is an opportunity to improve flooding for this dwelling at the expense of

causing downstream flood effects. This betterment should be investigated further at future design stages.

7	248 Helvetia Road, building floor levels: 67.2m RL	Residential building – FUZ within the existing floodplain	Future Urban Development in the FUZ	2.1° CC: 67.7m RL 3.8° CC: 67.7m RL	High existing and future risk
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Figure 5: NoR 7 Risk Areas

2.11 NOR 8: Mill Road – Pukekohe East Road Upgrade:

NoR 8 is an upgrade of the existing Pukekohe East Road and Mill Road and has sections located in both the Auckland and Waikato Regions. It includes widening Mill Road for additional vehicle lanes and a shared path from State Highway 1 to Harrisville Road and then a shared path on the southern side of the road from this point into Pukekohe along Pukekohe East Road. NoR 8 passes through the Whangapouri Stream catchment, Tatuani Stream catchment and the Ngakoroa Stream catchment from west to east. The majority of the alignment is within the rural zone with only the most western part in the Pukekohe FUZ.

NoR 8 crosses two overland flow paths. These flowpaths are both branches of the Ngakoroa Stream and already have culverts constructed under the existing road. Both culverts may need to be lengthened or upgraded to accommodate the widened road.

Key features of the proposed road include the following:

- Pukekohe East Road is proposed to be upgraded 3.4 kms for walking and cycling facilities on the southern side from Harrisville Road in the east to NoR 8 in the west.
- Upgraded culverts are proposed.

Flood Hazard Summary

The NoR alignment follows the existing Mill Road section and crosses two flow paths, both serviced by existing culverts. The road widening may not require any culvert lengthening or include any floodplain filling with the NoR design. However, future designs might require culvert lengthening. No adverse flood effects are expected from this NoR. Any future designs that may include culvert modification can meet the designation conditions by modelling the effect of the works and oversizing the culvert extension if unacceptable flood effects are found.

The land uses upstream of Point 1 (refer figure below) located in the Auckland Region is farmland and floodplain with some dwellings nearby. Future buildings nearby will need to be considered when deciding on an acceptable level of flood hazard change. The downstream building at 44 Mill Road is located at a low elevation and may become flood prone as a result of the NoR 8 project works or as a result of climate change. This culvert crossing will likely not be altered and therefore the effects of lifting or lowering the road crest would have the most significant effect on flood levels. Lifting the road would reduce the freeboard to 44 Mill Road and lowering the road would exacerbate flooding to 44 Mill Road. No change in road crest elevation is therefore recommended to minimise flood effects.

The modelled 3.0 climate change scenario produced an overall higher flood level. However, the flood risk rating will remain negligible based on the road crest height allowing flow to overtop the road before causing adverse effects on the upstream land. The only exception being 44 Mill Road where the more severe climate change impact would change this properties flood hazard rating from medium to high.

1	155 Mill Road, building floor level: 145m RL	Rural lifestyle block - Rural - Mixed Rural Zone	Remain rural lifestyle block	2.1° Climate change: 144.8m RL	Moderate existing and future risk
				3.8° Climate change: RL 145.2m RL	High risk existing and future risk

Figure 6: NoR 8 Risk Areas

2.12 Flood Hazard Effects During Construction

In their Flood Hazard Report, the Requiring Authorities acknowledge that there is the potential for construction phase flooding effects. Therefore, for each NoR route an assessment of the potential flood hazard has been included based on the type of work that will be taking place (e.g. embankments, bridge and culvert construction) relative to the local flood characteristics. As detailed in the draft conditions of consent further detail is proposed to be provided in the Construction Environmental Management Plan (CEMP) for each NoR route including the form of any mitigation. Indicatively the issues that will be considered include the following:

- Siting construction yards and stockpiles with minimal effects on flood flows.
- Methods to reduce the conveyance of materials and plant that is considered necessary to be stored or sited within the flood plain (e.g. actions to take in response to the warning of heavy rainfall events)
- Staging and programming to carry out work when there is less risk of high flow events.
- Diverting overland flow paths away or through areas of work.
- Minimising the physical obstruction to flood flows at the road sag point.

3.0 Recommended NoR Conditions

The following operational flood hazard related NOR conditions have been proposed by the Requiring Authorities for their respective Notices of Requirement:

Auckland Transport NoRs 3, 4, 6, 7

2 Flood Hazard

- The Project shall be designed to achieve the following flood risk outcomes:
 - no increase in flood levels in a 100 AEP event for existing authorised habitable floors that are already subject to flooding or have a freeboard less than 100mm
 - no more than a 10% reduction in freeboard in a 100 AEP event for existing authorised habitable floors with a freeboard of over 100mm
 - no increase in 100 AEP flood levels for existing authorised community, commercial, industrial and network utility building floors that are already subject to flooding
 - no more than 10% reduction in freeboard in a 100 AEP event for existing authorised community, commercial, industrial and network utility building floors
 - no increase of more than 100mm in flood level in a 100 AEP event on land zoned for urban or future urban development where there is no existing dwelling
 - no new flood prone areas and
 - no more than a 10% average increase of flood hazard (defined as flow depth times velocity) for main access to authorised habitable dwellings existing at time the Outline Plan is submitted. The assessment shall be undertaken for the 100 AEP rainfall event.
- Compliance with this condition shall be demonstrated in the Outline Plan, which shall include flood modelling of the pre-Project and post-Project 100-year ARI flood levels for Maximum Probable Development land use and including climate change
- Where the above outcomes can be achieved through alternative measures outside of the designation such as flood stop banks, flood walls, raising existing authorised habitable floor level and new overland flow paths or varied through agreement with the relevant landowner, the Outline Plan shall include confirmation that any necessary landowner and statutory approvals have been obtained for that work or alternative outcome.

Waka Kotahi NoRs 2 and 6

Flood Hazard

- a. The Project shall be designed to achieve the following flood risk outcomes
 - i. no increase in flood levels for existing authorised habitable floors that are already subject to flooding or have a freeboard less than 100mm
 - ii. no more than a 10% reduction in freeboard for existing authorised habitable floors
 - iii. no increase of more than 100mm in flood level on land zoned for urban or future urban development where there is no existing dwelling
 - iv. no new flood prone areas and
 - v. no more than a 10% average increase of flood hazard (defined as flow depth times velocity) for main access to authorised habitable dwellings existing at time the Outline Plan is submitted.
- b. Compliance with this condition shall be demonstrated in the Outline Plan, which shall include flood modelling of the pre-Project and post-Project 100 year ARI flood levels for Maximum Probable Development land use and including climate change
- c. Where the above outcomes can be achieved through alternative measures outside of the designation such as flood stop banks, flood walls, raising existing authorised habitable floor level and new overland flow paths or varied through agreement with the relevant landowner, the Outline Plan shall include confirmation that any necessary landowner and statutory approvals have been obtained for that work or alternative outcome.

Construction Environmental Management Plan

The Construction Environmental Management Plan (CEMP) condition common to each NoR is as follows, including provision for flood hazard assessment

- a. A CEMP shall be prepared prior to the Start of Construction for a Stage of Work. The objective of the CEMP is to set out the management procedures and construction methods to be undertaken to, avoid, remedy or mitigate any adverse effects associated with Construction Works as far as practicable. To achieve the objective, the CEMP shall include
 - a. the roles and responsibilities of staff and contractors
 - b. details of the site or project manager and the project Liaison Person, including their contact details (phone and email address)
 - c. the Construction Works programmes and the staging approach, and the proposed hours of work
 - d. details of the proposed construction yards including temporary screening when adjacent to residential areas, locations of refuelling activities and construction lighting
 - e. methods for controlling dust and the removal of debris and demolition of construction materials from public roads or places
 - f. methods for providing for the health and safety of the general public
 - g. measures to mitigate flood hazard effects such as siting stockpiles out of floodplains, minimising obstruction to flood flows, actions to respond to warnings of heavy rain
 - h. procedures for incident management
 - i. procedures for the refuelling and maintenance of plant and equipment to avoid discharges of fuels or lubricants to Watercourses
 - j. measures to address the storage of fuels, lubricants, hazardous and/or dangerous materials, along with contingency procedures to address emergency spill response and clean up
 - k. procedures for responding to complaints about Construction Works and
 - l. methods for amending and updating the CEMP as required.

4.0 Assessment of Effects

The NoRs are proposed to be constructed and operated in the catchments of Ngakoroa Stream, Oira Stream, Whangapouri Stream and Tūtaenui Stream. In brief, each NoR proposes the construction of new or widening to existing carriageways and the inclusion of additional transport modes using cut and fill techniques and in several cases the construction of new bridges across stream systems. Each NoR will be served by drainage infrastructure owned and operated by each Requiring Authority (i.e. Waka Kotahi and Auckland Transport) generally comprising formed open drains culverts, bridges, swales, stream diversions, piped reticulation and stormwater management device such as wetlands

As was discussed earlier in this memorandum, this assessment focuses on the land use changes in flood hazard (overland flow and flood plains) as a result of constructing and operating the arterial routes. The Requiring Authorities have proposed a suite of stormwater management devices for each NoR route in line with current practice to address the effects of stormwater runoff from the impervious surfaces (e.g. stormwater contaminants, hydrology mitigation, flood peak flow attenuation). This has included provision within each designation boundary to construct and operate the management devices (e.g. treatment and attenuation wetlands). Effects assessment of the stormwater discharges will be assessed at a later date when regional consents are sought for each route and are therefore not assessed in further detail here. Several submissions have discussed the location of the wetland devices. I have assessed and responded to the submissions in Appendix of this memorandum.

4.1 Flood Hazard Assessment

As a result of constructing and operating each NoR route flood hazard effects may include changes to the flood freeboard to habitable buildings, overland flow paths, the ability to access property by residents and emergency vehicles, the depth of flooding to roads and flooding arising from the blockage of stormwater drainage. In order to understand and assess the potential flood hazard effects, the Requiring Authority's engineering consultant has developed risk rating criteria to assess against the respective flood hazard model results.

This risk rating criteria has enabled a consistent method for assessment of flood hazard risk in relation to less vulnerable, moderately vulnerable and highly vulnerable land use types using existing flood hazard model information including assumptions regarding matters such as maximum probable development (MDP) future land use cover and climate change scenarios (2.0 degrees and 3.0 degrees where applicable to that catchment). It is noted the risk rating criteria has been used to inform the NoR application and assessment process across the various projects and does not carry through to risk assessments in the respective NoR conditions proposed by the Requiring Authorities. As is indicated in the section above the conditions seek to achieve a set of flood hazard related outcomes.

During pre-judgement discussions with the Requiring Authority, I queried whether pre and post development scenarios (including the proposed terrain and alignments for each NoR) should have been modelled such as was the case for the Drury NoRs (which I had a similar role in assessing).

The Requiring Authority's engineering consultant indicated that role of the flood hazard assessment at this time is to identify the designation area is sufficient to provide for the alignment construction and operation and any associated works for flood mitigation techniques (discussed in the next section of each NoR). On balance I agree with the approach and find the use of the risk criteria sufficient to identify the quantum of effect that current exists for various properties (particularly in relation to moderate and high risk areas) and correspondingly that will exist in the future when detailed design is completed via the proposed conditions of the Outline Plan process. In principle, the detailed design process will also capture flood hazard that has not been identified in the flood hazard report, but may eventuate as a result of matters such as land use change over the coming decades. Notwithstanding this, I have various comments in relation to the proposed conditions later in this report.

The Auckland Region has experienced extreme weather events earlier this year, in some cases beyond the magnitude (rainfall depth/intensity) of what is typically used as a reference rainfall event in relation to site flood risk assessment. Currently the 100 AEP rainfall event (i.e. 1 in 100

chance of occurring in any one year is embedded in regional and district objectives, policy and rule frameworks, including the influence of climate change to accommodate predictions in rainfall intensity and duration. In this case the RFHA includes a projected annual average temperature increase by 2090 of 2.0°C and for the respective catchment models, the more conservative climate change scenario of 3.0°C. During prelodgement discussions, I queried whether sensitivity analysis should be completed for a further conservative climate change scenario noting the lapse period for constructing the NoRs is up to 20 years. The Requiring Authority's engineering consultant responded as follows:

A range of sensitivity assessments can be carried out not limited to rainfall but also to surface roughness, percentage culvert blockage, tailwater conditions, impervious surface/ soil infiltration changes. These sensitivity assessments would be more beneficial at the resource consent phase in understanding the performance of the model and the sensitivity of the design effects. At this stage, (NoR for the designation of a road) assessing a higher flood depth would not lead to the identification of any new properties at risk or any change in condition. Therefore, I propose additional sensitivity not be undertaken until resource consent phase.

I agree with this response and consider over time flood hazard prediction will continue to evolve through local and national direction as an evidence base is developed in relation to planning for the influence of more extreme rainfall events. The proposed NoR conditions also need to be sufficiently flexible to accommodate a range of model sensitivity scenarios using the best information available at that time including more conservative climate change scenarios, if that eventuates, noting flood hazard prediction and modelling is not an exact science, but rather a tool to assist with decision making and assessment of the NoRs against the applicable objectives and policies in the AUP.

I conclude the assessment methodology presented in the Flood Hazard Report and how the model results have been reported at this stage of the project design at this time is fit for purpose. Further, the findings for each NoR route are suitable to understand the quantum of flood hazard effects, albeit being based on existing flood hazard information and current land forms. This conclusion is reached on the basis that further detailed analysis will be carried out during the detailed design phase should the notices of requirement be approved, thereby placing some reliance on the effectiveness of the designation conditions and the outcomes sought in relation to floodplain and overland flow path flood hazard management. To assist with the implementation of designation condition implementation, I have recommended edits to the NoR conditions in Section 4 of this memorandum with associated commentary outlining why the edits are recommended.

4.2 Flood Hazard Assessment Results Summary and Proposed Mitigation

Overall it is concluded that the potential flood hazard effects understood and there is a provision for mitigation through the performance-based requirements stipulated in the respective NoR conditions, noting I have recommended changes to the conditions in Section 4 of this memorandum. It is anticipated understanding of flood hazard effects will continue to be defined as detailed design progresses for each NoR and will include flexibility to capture the potential for the emergence of new flood hazards (e.g. due to concurrent land use change) while also future proofing an evolving science of flood hazard management and prediction in light of the recent flood events and the realisation that climate change is not static.

As was discussed in the assessment above a component of the flood hazard assessment report and its findings was to understand flood hazard features in proximity to the designation and to demonstrate mitigation options are available. A summary of the mitigation options, material to this assessment are listed below. In principle, I agree these mitigation options align with good practice in terms of flood hazard and stormwater management, subject to detailed design in the future.

NoR 1 Drury West Arterial:

- Size culverts and bridges to meet proposed designation conditions on flood hazard outcomes.
- No attenuation in wetlands, attenuation will increase flow coincidence downstream.

Soft Lodgement Response Pukekohe Comments Register, prepared by SGA, September 2023

- Provide diversion channels at the toe of fill embankments to prevent ponding.
- Maintain $\geq 200\text{mm}$ freeboard to new bridge soffits using the 100-year ARI flood level with 3. Climate change hydrology.

NoR 2 Drury – Pukekohe Link:

- Size culverts and bridges to meet proposed designation conditions on flood hazard outcomes.
- No attenuation in wetlands in the lower half of the Ngakoroa and Oira Streams.
- Attenuation for the 10yr and 100yr where wetlands are located in the upper half of the Ngakoroa and Oira Streams

NoR 3 Paerata Connections:

- The Paerata Station Connection will connect to the station access road. A new culvert may be required at this flow path crossing and be sized to achieve the designation condition headwater effects.
- No flooding recommendations for the Sim to Sim Connection as this follows the terrain crest and has no flood water interaction.

NoR 4 Pukekohe North-East Arterial:

- Size culverts and bridges to meet proposed designation conditions on flood hazard outcomes.
- Attenuation for the 10yr and 100yr events in the Whangapouri, Ngakoroa and Oira Stream catchments
- Provide diversion channels at the toe of fill embankments to prevent ponding.
- Offset the flood volume displaced by filling in the floodplain with an equivalent volume of excavation within the floodplain.
- Maintain $\geq 200\text{mm}$ freeboard to new bridge soffits using the 100-year ARI flood level with 3. Climate change hydrology.

NoR 5 Pukekohe South-East Arterial:

- Size culverts and the bridge over the NIMT railway to meet proposed designation conditions on flood hazard outcomes.
- Avoid lifting the crown of the road along Golding Road to prevent adverse effects upstream.
- Attenuation for the 10yr and 100yr in the Whangapouri and Tatuani Stream catchments
- Provide diversion channels at the toe of fill embankments to prevent ponding.
- Offset the flood volume displaced by filling in the floodplain with an equivalent volume of excavation within the floodplain.

NoR 6 South-West Upgrade:

The future design stages will need to meet the flood hazard outcomes included on the existing designation.

NoR 7 Pukekohe North-West Arterial:

- Size culverts and bridges to meet designation conditions on flood hazard outcomes.
- Retain culvert sizes at the existing culverts near the Glenbrook Rail Line and Butcher Road to maintain the same flowrate and not cause new or exacerbate upstream flood risk.
- Attenuation for the 10yr and 100yr in the Whangapouri Stream catchment.

NoR 8 Mill Road and Pukekohe East Road Upgrade:

- Retain culverts at the same diameter and replace culverts at the same diameter.
- Avoid lifting the crown of the road along Mill Road to prevent adverse effects upstream. Or lowering the road crown to cause effects downstream.
- Attenuation for the 10yr and 100yr in the Ngakoroa and Tatuani Stream catchments.

4.3 Flood Hazard Effects During Construction

In the Flood Hazard Report, the Requiring Authority's engineering consultant has discussed the potential location specific flood hazard effects associated with constructing the NoR sections. This is based on the type of work that is anticipated to be carried out (e.g. culvert and bridge abutment construction, cut and fill activities, diversions). Due to the dynamic nature of construction staging it is not typical practice to assess potential flood hazard in the manner that has been completed for the permanent operational phase of the arterial routes. Therefore, a consent condition has been recommended by the Requiring Authorities requiring flood hazard assessment during construction and associated mitigation is addressed as part of the Construction Environmental Management Plan (CEMP). This proposed approach is considered satisfactory to assess and or mitigate any temporary flood hazard effects associated with the construction activities. No edits are recommended to the CEMP conditions.

5.0 Submissions

Relevant submissions and their assessment have been tabulated in Appendix I. I note there were no relevant submission for NoR to assess.

6.0 Conditions

I have reviewed the conditions in consultation with Healthy Waters staff and have the following recommendations indicated in underlined additions, with deletions ~~strikethrough~~. I recommend the edits apply to both Requiring Authorities (i.e. Auckland Transport and Waka Kotahi). The recommended edits are common to all NoR Flood Hazard condition sets.

Flood Hazard Condition.

- a. The Project shall be designed to achieve the following flood risk outcomes:
 - i. no increase in flood levels in a 100 AEP event for existing authorised habitable, community, commercial, industrial floors that are already subject to flooding or have a freeboard less than 100mm
 - ~~ii. no more than a 100 reduction in freeboard in a 100 AEP event for existing authorised habitable floors with a freeboard of over 100mm~~
 - ~~iii. no increase in 100 AEP flood levels for existing authorised community, commercial, industrial and network utility building floors that are already subject to flooding~~
 - ~~iv. no more than a 100 reduction in freeboard in a 100 AEP event for existing authorised community, commercial, industrial and network utility building floors~~
 - ii. Maintain the minimum freeboard requirement outlined in the relevant code of practice at time the Outline Plan is submitted (currently, Auckland Code of Practice for Land Development for Subdivision Chapter 4 Stormwater Version 3.0, January 2022)
 - ~~iii. no increase of more than 100mm in the 100 AEP event on land zoned for urban or future urban development where there is no existing dwelling on land zoned for urban or Future Urban. No increase in flood plain extent unless there is a site specific flood assessment to show there is no reduction in developable land in urban or Future Urban Zone~~
 - iv. new overland flow paths shall be diverted away from habitable floors and discharge to a suitable location with no increase in flood levels in a 100 AEP event downstream
 - v. no loss in conveyance capacity or change in alignment of existing overland flow paths, unless provided by other means
 - vi. no new flood prone areas and
 - vii. no more than a 100 average increase of flood hazard (defined as flow depth times velocity) classification for main vehicle and pedestrian access to authorised habitable dwellings existing at the time the Outline Plan is submitted. The assessment of flood hazard shall be undertaken for the 100 and 100 AEP rainfall events.
- b. Compliance with this condition shall be demonstrated in the Outline Plan developed in consultation with the Auckland Council Healthy Waters (or its equivalent) which shall include flood modelling of the pre-Project and post-Project ~~100 year ARI~~ 100 AEP flood levels for Maximum Probable Development land use and including climate change.
- c. Where the above outcomes can be achieved through alternative measures outside of the designation such as flood stop banks, flood walls, raising existing authorised habitable floor level and new overland flow paths or varied through agreement with the relevant landowner, the Outline Plan shall include confirmation that any necessary landowner and statutory approvals have been obtained for that work or alternative outcome.

Advice Note

Consultation with Auckland Council Healthy Waters (or its equivalent) to identify opportunities for collaboration on catchment improvement projects is encouraged at the detailed design stage.

Commentary On Condition Edits

- Simplified condition outcomes with regard to buildings that are already subject to flooding and included other building types, with consequential deletion of ii, iii and iv. Propose removing metrics around specific numbers (e.g. 100mm) as may become obsolete in the future.
- Referencing code of practice freeboard requirement, including futureproofing minimum freeboards as the document evolves.
- Remove 100mm metric as may be a blunt instrument depending on floodplain topography (e.g. confined floodplain vs flood plains that are flat and open) enable site specific assessment to determine suitability of flood level increase vs land use type.
- iv and v Introduction of overland flow specific conditions for new and existing overland flow paths to clarify an expectation around their management. iv could be a duplication of assessment that will be required with respect to future stormwater discharge consent application requirements but I have conservatively added this as an outline plan outcome.
- vii The use of the 100 metric has limited relativity (e.g. 100 increase at some sites will have a more significant effect than at other sites where there is no flood hazard) Current flood hazard approaches (e.g. Australian Disaster Resilience Handbook Collection – Flood Hazards Guideline 7.3) provides flood hazard curves related to the risk to people and vehicles, hence the introduction of a classification metric to assess and identify risk.
- b A/P vs ARI terminology. It is unclear why the Requiring Authorities are using both. Addition of reference to consult with Healthy Waters is self-explanatory as the body who hold regional flood hazard modelling information.
- The proposed advice note is self-explanatory.

7.0 Objective and Policies

The natural hazards and flooding related Auckland Unitary Plan objectives and policies relevant to the NoRs are listed as follows

- B0 Environmental Risk
 - B0.2 Objectives 1- 4
 - B0.2.2 Policies 3, 4, 5, 6, 7 and 12
- 3 Natural Hazards and Flooding
 - 3.2 Objectives 1- 4
 - 3.3 Policies 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30 and 31

Consistent with Chapter B0, the Requiring Authorities have identified and assessed current flood risk associated with the NoR routes and have used tools such as flood hazard mapping and the application of risk ratings to identify negligible, low, medium and high risk areas. This has led to decisions around the extent of the designation required and the type of mitigation methods proposed to be employed in the future subject to detailed design and associated post development flood hazard assessment with the designation alignments in place.

The Requiring Authorities have also sought to incorporate the influence of climate change projections consistent with Policy B0.2.2, including the more conservative scenario of 3.0 degrees where applicable to that catchment. This is also consistent with the precautionary approach to natural hazard risk management and the Requiring Authority's engineer has indicated this will also include other sensitivity assessments (e.g. surface roughness, percentage culvert blockage, tailwater conditions, impervious surface/soil infiltration changes) to assess the response of the infrastructure and surrounding land uses to low probability but high potential impact rainfall events.

Although post development flood risk has not been assessed as part of the NoRs, the quantum of flood risk hazard is understood with the information currently available such that there is a pathway through the proposed designation conditions for mitigation. In consultation with Healthy Waters, I have also recommended condition edits as is discussed in the above section.

Further assessment is required during detailed design of the NoR routes where suitable performance requirements will need to be met as conditions of designations contributing to overall consistency with the B0 and 3 objectives and policies.

8.0 Conclusions and recommendations

The assessment in this memorandum does not identify any reasons to withhold the NORs. The flood hazard assessment of the proposals considered by this memorandum that could be granted subject to recommended conditions, are for the following reasons:

- The Requiring Authorities have used a fit for purpose flood hazard risk assessment method using a series of steps to establish and assign an operational risk rating.
- The flood hazard modelling accounts for the effects of climate change by adjusting for changes in temperature and rainfall patterns in accordance with Mf guidance.
- The flood hazard modelling and reporting of the results is suitable to inform the quantum of flood hazard that exists and whether the designation extent is suitable to implement mitigation practices through the performance related flood hazard designation conditions. Further flood hazard modelling will be required as part of the Outline Plan including modelling of post project landforms and infrastructure.
- Subject to the imposition of the designation conditions the proposal is not inconsistent with the flood hazard related objectives and policies in the Auckland Unitary Plan.



Trent Sunich
Consultant Stormwater Technical Specialist

Appendix 1: Relevant Submission Summary and Assessment

NoR 2: Drury to Pukekohe Link

Submitter No.	Name	Submission Point/Issue Raised	Relief Sought	Technical Assessment
01	Lloyd Harrison and Melina Ah Wong 43 Tuhimata Road	We disagree with the use of rural zoned land for development. We feel that the land under NOR 2 for the purpose of Storm water Wetland Attenuation Device is on the highest point of land, and would require extensive excavation for this purpose. The discharge from the Storm water Wetland Attenuation Device planned for the west side of our property, is an area where the land is prone to landslides/creeeping, which has already occurred.	We ask that the Storm water Wetland Attenuation Device and discharge of, be moved approximately 100 metres further South/South East towards the natural low area, to avoid excessive excavation of land. This would then be within the FUZ and not encroach on rural zoned land	I support the functionality of the proposed wetland and I do not have a view on its exact location until further detailed design can be completed on route design and the associated requirements to manage stormwater runoff through the regional consent process to authorise the stormwater discharges. This is a matter for the Requiring Authority to respond to with respect to this site selection.
20	Paerata Farms Ltd 32 and 42 Sim Road	There is no appropriate stormwater solution for the arterial road network. The NoR material contains insufficient detail on the proposed stormwater solutions for treatment and attenuation including final location of devices and the overland flow from these devices. The locations of the devices do not have consideration of future roading connections to the PFL landholding and their elevated position in relation to the lower land to the West of Sim Road will require appropriate geotechnical consideration for slope stability. Future lot owners are at risk of stormwater bunds failing or spillways engaging and flooding occurring – there seems to be no allowance for easements or any other legal mechanism to allow for passage of this water between the devices, through the PFL	Decline the NoR or amend it to respond to the concerns of the submitter	<ul style="list-style-type: none"> In the flood hazard report the Requiring Authority has listed the functionality of the components of the stormwater management system which align with typical practice of green field stormwater management outlined in Guidance Document 01. In principle I agree with the proposed

Submitter No.	Name	Submission Point/Issue Raised	Relief Sought	Technical Assessment
		<p>land and to the outlet on the downstream side of the site. The NoR also those projects and works to ensure a more efficient use of infrastructure and land should have sought integration or combining with the KiwiRail designation and the associated stormwater solutions for those projects and works to ensure a more efficient use of infrastructure and land.</p> <p>The submitter opposes the conditions as they do not address concerns of the submitter outlined above and in addition for following reasons</p> <p>The project should not enable any increase in flood hazard even by 0mm on any sites.</p> <p>This creates an unacceptable hazard for which future developers and landowners will have to bear the costs of future technical work to mitigate the flood risk</p> <p>Any new flood risk will devalue land by creating a "hazard" on sites where no such hazard existed.</p>		<p>functionality which will also be subject to future detailed design and regional resource consent applications for stormwater discharges.</p> <ul style="list-style-type: none"> • I have recommended amendments to the NoR conditions to limit off site flood hazard related effects. • Other topics such as geotechnical matters, easements and coordination with other projects are matters for the Requiring Authority to respond to.

NoR 3: Paerata Connection

Submitter No.	Name	Submission Point/Issue Raised	Relief Sought	Technical Assessment
1	Paerata Farms Limited 32 and 4 Sim Road	<p>There is no appropriate stormwater solution for the arterial road network. The NoR material contains insufficient detail on the proposed stormwater solutions for treatment and attenuation including final location of devices and the overland flow from these devices. The locations of the devices do not have consideration of future roading connections to the PFL landholding and their elevated position in relation to the lower land to the West of Sim Road will require appropriate geotechnical consideration for slope stability.</p> <p>Future lot owners are at risk of stormwater bunds failing or spillways engaging and flooding occurring – there seems to be no allowance for easements or any other legal mechanism to allow for passage of this water between the devices, through the PFL land and to the outlet on the downstream side of the site. The NoR also should have sought integration or combining with the KiwiRail designation and the associated stormwater solutions for those projects and works to ensure a more efficient use of infrastructure and land.</p> <p>The submitter opposes the conditions as they do not address concerns of the submitter outlined above and in addition for following reasons</p> <p>The project should not enable any increase in flood hazard even by 100mm on any sites.</p> <p>(i) This creates an unacceptable hazard for which future developers and landowners will have to bear the costs of future technical work to mitigate the flood risk</p> <p>(ii) Any new flood risk will devalue land by creating a “hazard” on sites where no such hazard existed.</p>	Decline the NoR or amend it to respond to the concerns of the submitter	<ul style="list-style-type: none"> In the flood hazard report the Requiring Authority has listed the functionality of the components of the stormwater management system which align with typical practice of green field stormwater management outlined in Guidance Document 0. In principle I agree with the proposed functionality which will also be subject to future detailed design and regional resource consent applications for stormwater discharges. I have recommended amendments to the NoR conditions to limit off site flood hazard related effects. Other topics such as geotechnical matters, easements and coordination with other projects are matters for the Requiring Authority to respond to.

NoR 4: Pukekohe North-East Arterial

Submitter No.	Name	Submission Point/Issue Raised	Relief Sought	Technical Assessment
4	Ken Vincent and Andrew Vincent, Pukekohe Industrial Park and Storage Limited 99 Paerata Road	<p>The site affected is 99 Paerata Road (SH22). The land on the eastern side of Whangapouri Creek is low-lying and subject to flooding from the Creek, and is undevelopable therefore. A second farm drain conveying overland flow enters the western boundary and discharges into the Whangapouri Creek to the east, through the centre of the site. The majority of the site is subject to a flood plain which the Submitter understands is caused by the downstream culvert beneath SH22 to the north being undersized, causing upstream flooding, including within the site.</p> <p>There is little analysis of the potential flood effects arising within the site from the proposed extent of battering. The Submitter understands this is because the resultant flood effects will be experienced outside of the subject site. The Submitter would support such an outcome.</p> <p>The Submitter supports NOR 4 on the basis that no flood effects or change in flood levels will arise on the subject site, as stated in the Flood Assessment supplied by the Requiring Authority.</p> <p>The Submitter supports the location of the North East Arterial Wetland on the southern side of Butchers Road</p>	<p>Condition 2 Flood Hazard – given the extent of the flood plain in and around the Submitter’s property and with reference to the conditions for the North West NORs</p> <p>i. Clause 2a(vii) should also refer to the 10, 20, 50 and 100 AEP rainfall events, not only the 100 AEP event.</p> <p>ii. Clause 2b should reference the 10 and 100 AEP flood levels, not only the 100 year ARI flood level.</p>	<p>I have recommended amendments to the NoR conditions, including provision for assessing the effects of smaller rainfall events (e.g. 10 AEP).</p>

Submitter No.	Name	Submission Point/Issue Raised	Relief Sought	Technical Assessment
00	<p>Sir William Birch on behalf of Siobhan Ainsley</p> <p>07 and 030 Pukekohe East Road</p>	<p>A pre-application meeting for the Private Plan Change for part of 07 and part of 030 Pukekohe East Road, Pukekohe was held with senior Council Planners and officers of Water Care and Auckland Transport on 02 September 2023.</p> <p>A major concern is that the proposed location of a stormwater treatment pond on NOR 0 that provides for treatment from the wide roading on the southern side of Pukekohe East Road is in the centre of the land at 04 Pukekohe East Road that is planned for residential development. This does not make any sense and would be strongly opposed by our client. On the other hand it is a relatively simple matter to build the SW treatment pond either on the adjoining rural land owned by our client or somewhere in the proximity of the site shown on our attached concept plan to treat the runoff from Pukekohe East Road and the proposed residential development shown on our plan. It makes sense to have a single community owned pond to treat both the road water and the subdivision water and to design the ultimate subdivision to provide for this. This matter has been discussed with Supporting Growth and we hope to meet and explore this option further before the designations are finalised.</p>		<p>I support the functionality of the proposed wetland and I do not have a view on its exact location until further detailed design can be completed on route design and the associated requirements to manage stormwater runoff through the regional consent process to authorise the stormwater discharges.</p> <p>The Requiring Authority may wish to comment of the feasibility of moving the location of the wetland as requested in this submission.</p>

NoR 5: Pukekohe South-East Arterial

Submitter No.	Name	Submission Point/Issue Raised	Relief Sought	Technical Assessment
09	Sir William Birch on behalf of Siobhan Ainsley	<p>A pre-application meeting for the Private Plan Change for part of 07 and part of 03 Pukekohe East Road, Pukekohe was held with senior Council Planners and officers of Water Care and Auckland Transport on 02 September 2023.</p> <p>A major concern is that the proposed location of a stormwater treatment pond on NOR 04 that provides for treatment from the wide roading on the southern side of Pukekohe East Road is in the centre of the land at 04 Pukekohe East Road that is planned for residential development. This does not make any sense and would be strongly opposed by our client. On the other hand it is a relatively simple matter to build the SW treatment pond either on the adjoining rural land owned by our client or somewhere in the proximity of the site shown on our attached concept plan to treat the runoff from Pukekohe East Road and the proposed residential development shown on our plan. It makes sense to have a single community owned pond to treat both the road water and the subdivision water and to design the ultimate subdivision to provide for this. This matter has been discussed with Supporting Growth and we hope to meet and explore this option further before the designations are finalised.</p>		<p>I support the functionality of the proposed wetland and I do not have a view on its exact location until further detailed design can be completed on route design and the associated requirements to manage stormwater runoff through the regional consent process to authorise the stormwater discharges.</p> <p>The Requiring Authority may wish to comment of the feasibility of moving the location of the wetland as requested in this submission.</p>

NoR 6: Pukekohe South-West Upgrade

Submitter No.	Name	Submission Point/Issue Raised	Relief Sought	Technical Assessment
3	<p>□wen Campbell and Beverley □ileen McIntyre</p> <p>□Ward Street</p>	<p>A maōr rebuild of the area some years ago to install a traffic roundabout and improve floodwater egress certainly worked early this year when large rainfall events occurred. This area receives a significant amount of surface water running off Pukekohe hill.</p>	<p>We would hope that there would be no changes that would increase the likelihood of our house being flooded.</p>	<p>The outcome related NoR conditions, including my recommended edits aim to avoid the e□acerbation of flood hazard as a result of the designation works.</p> <p>It is noted this and surrounding properties are in the □□ A□P floodplain according to AC Geomaps.</p>

NoR 7: Pukekohe North-West Arterial

Submitter No.	Name	Submission Point/Issue Raised	Relief Sought	Technical Assessment
□	Des Morrison □7 and □7A Butcher Road Pukekohe	As our Butcher Road property is at the lower end of the catchment, strategies, and solutions to mitigate flooding concerns in a Residential Mixed Housing Suburban zone are required. At present the assessment appears to be based on existing use and location of dwellings rather than the planned residential use. Accordingly, in our view, it may underestimate the likely effects and mitigations required. In particular, it may be that one stormwater attenuation device of the size proposed is not sufficient or the most appropriate way to address the effects of the arterial given the planned residential "medium density" development anticipated to occur within the catchment. We consider it is critical that an integrated approach is taken so that all relevant effects are considered and comprehensively addressed in a manner that supports and does not undermine the planned urban form for the area. It may be that there are better ways to address stormwater through provision for park or reserve areas which could act as a water sink capable of managing water volumes during the catastrophic weather events while at the same time providing further recreational facilities for the surrounding residential communities. These options do not appear to have been considered.	Seek that the NOR7 is declined unless or until the matters raised in this submission have been appropriately addressed, and/or agreement is reached for early sale of our property on the basis set out in this submission.	<p>The analysis in the Flood Hazard report includes allowance for maximum probable development (MPD) scenarios, including development Future Urban Zoned land that surrounds the submitters property.</p> <p>I support the concept of integrated management and future catchment planning associated with land use change and rezoning should aim to integrate and maximise efficiency of use of stormwater management devices. I have proposed an advice note in this regard and aligns with best practice in any case.</p>

NoR 8: Mill Road and Pukekohe East Road Upgrade

Submitter No.	Name	Submission Point/Issue Raised	Relief Sought	Technical Assessment
4, □	<p>Lachlan Johnstone on behalf of Maimere Properties Ltd.</p> <p>Martha Johnstone on behalf of MC Johnstone, LJC Johnstone and LF Williams</p> <p>□97 Pukekohe □ast Rd</p>	<p>We would re□uire engineered storm water retention□etention systems to effectively manage all stormwater coming off the roads. The current stormwater management mechanisms are ineffective and contribute to the degradation of the ONF □Outstanding Natural Feature□alongside the road.</p>		<p>Viewing the design plans, the stormwater management proposal for this section of the designation ad□acent to the ONF is limited in detail □other than the mitigation options listed in the Flood Hazard Report□ Some further commentary from the Re□uiring Authority would be if assistance in this regard to specifically address this submission.</p>
9	<p>Rodney Cunningham</p> <p>□0 Mill Road</p> <p>□located in the Waikato District□</p>	<p>Negative impacts on our property □0 Mill Rd Bombay. Notable immediate impacts include□</p> <ul style="list-style-type: none"> • Increased stormwater run off into our property at □0 Mill Rd, Bombay 		<p>Viewing the design plans, the stormwater management proposal for this section of the designation is limited in detail □other than the mitigation options listed in the Flood Hazard Report□ Some further commentary from the Re□uiring Authority would be if assistance in this regard to specifically address this submission.</p>

Technical memorandum

Notices of Requirement for works NoR1 to NoR8: Archaeology

To: Karen Bell, Consultant Planner to Auckland Council

And to: Joe McDougall, Policy Planner, Auckland Council.

From: Myfanwy Eaves, Senior Specialist: Archaeology, Cultural Heritage Implementation, Heritage Unit, Auckland Council.

- | | |
|-------------------------------|---|
| 1. Application details | Route protection for planned future growth of Pukekohe, Paerata and Drury. The application includes provision for improved walking, cycling, public transport, and general traffic connections. |
| Applicant's name: | Te Tupu Ngātahi Supporting Growth Alliance, Auckland Transport (AT) and Waka Kotahi (NZTA) |
| Application number: | NoR 1 Drury West Arterial (AT); NoR 2 Pukekohe Link (NZTA), NoR 3 Paerata Connections (AT), NoR 4 Pukekohe NE Arterial (AT), NoR 5 Pukekohe SE Arterial (AT), NoR 6 Pukekohe SW upgrade (AT), NoR 7 Pukekohe NW upgrade (AT), NoR 8 Mill Road and Pukekohe east upgrade (NZTA)(also includes Waikato District Council portion). |
| Activity types: | Various |
| Site address: | Franklin Local Board area |

2. Introduction

Qualifications and relevant experience

- 2.1. My name is Myfanwy May Eaves, and I am a Senior Specialist Archaeology at Auckland Council (**Council**).
- 2.2. I have a Bachelor of Arts (BA) and Master of Arts (MA) (Hons) from Auckland University in Anthropology and Chinese. I also have a Master of Social Sciences (MSocSci) (IA) from the University of Birmingham, United Kingdom in Industrial Archaeology.
- 2.3. In my current role, which I have been in for nine (9) years, I am required to undertake technical reviews of resource consent applications and Notices of Requirement. I also provide advice and subject matter expertise assessments to Council officers on matters relating to archaeology and historic heritage.
- 2.4. Prior to my time at the Council, I studied and worked in archaeology in New Zealand and overseas in several locations: Australia, mainland China, England and Wales. In addition, I have worked as a museum collections manager in Auckland (Auckland Museum) and Australia (Sydney, PHM/MAAS), and therefore understand the care and documentary progression of objects (and sites) from discovery to storage and display extremely well.

- 2.5. I am a member of the New Zealand Archaeological Association (**NZAA**), the International Council on Monuments and Sites NZ/ Te Mana o Nga Pouwhenua o Te Ao (**ICOMOS NZ**) and the Australasian Society for Historic Archaeology (**ASHA**).
- 2.6. I attended the Project site visit on 29 June 2023, provided by Te Tupu Ngātahi Supporting Growth Alliance. I am generally familiar with most of the area.

Expert Witness Code of Conduct

- 2.7. I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this evidence. Other than where I state that I am relying on the advice of another person, this evidence is within my area(s) of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express. I have qualified my evidence where I consider that any part of it may be incomplete or inaccurate, and identified any information or knowledge gaps, or uncertainties in any scientific information or mathematical models and analyses that I am aware of, and their potential implications. I have stated in my evidence where my opinion is not firm or concluded because of insufficient research or data or for any other reason and have provided an assessment of my level of confidence, and the likelihood of any outcomes specified, in my conclusion.

3. Overview and scope of technical memorandum

- 3.1. The Applicant, in its capacity as a requiring authority, has given notice to the Council of its requirement for designations to develop, construct, operate and maintain the necessary structures and facilities for:

- **NoR 1 Drury West Arterial (AT)** - A new transport corridor with active mode facilities in Drury West extending south from the intersection of SH22 and Jesmond Road to the edge of the Future Urban Zone near Runciman Road, Drury.
 - **NoR 2 Pukekohe Link (NZTA)** - A new state highway including a shared path. It includes sections of new and upgrades of existing transport corridors from Great South Road, Drury in the north-east, connecting to State Highway 22 in the west, and the area in the vicinity of Sim Road/Cape Hill Road, Pukekohe in the south. Documentation is included with NoR1.
 - **NoR 3 Paerata Connections (AT)** - Two new transport corridors including active mode facilities: One new connection between the existing Sim Road (south) and the Paerata Rail Station. The second new connection between the two extents of Sim Road across the NIMT
 - **NoR 4 Pukekohe NE Arterial (AT)** - A new transport corridor including active modes from SH22, Paerata in the north-west to Pukekohe East Road, Pukekohe in the south-east.
 - **NoR 5 Pukekohe SE Arterial (AT)** - A new and upgraded transport corridor in Pukekohe including active mode facilities. It upgrades part of Pukekohe East Road and Golding Road and a new connection between Golding Road (north of Royal Doulton Drive) and to Svendsen Road across Station Road and the NIMT.
 - **NoR 6 Pukekohe SW upgrade (AT)** - The upgrade of specific intersections and regrade of driveways on Nelson Street, Ward Street, West Street and Helvetia Road for active mode facilities.
 - **NoR 7 Pukekohe NW upgrade (AT)** - The upgrade of Helvetia Road, Pukekohe in the south-west and a new corridor from Helvetia Road to SH22 Paerata in the north-east with active mode facilities.
 - **NoR 8 Mill Road and Pukekohe east upgrade (NZTA)** - An upgrade of Mill Road (Bombay) in the east for additional vehicles lanes and shared path, and Pukekohe East Road, Pukekohe in the west for a shared path. A portion of the application is contained within Waikato District Council as DES0006/24.
- (the NoRs).**

- 3.2. The NoRs were publicly notified on 2 October 2023, and submissions closed on 13 November 2023.
- 3.3. I have reviewed the documentation provided for this application, specifically, *Pukekohe Transport Network Assessment of Effects on Historic Heritage*, September 2023 by Matthew Campbell of CFG Heritage Limited.¹
- 3.4. As a result, I made no Section 92 request for further information. I concur with statements made by Mr Campbell, applicant’s archaeologist.²
- 3.5. I note that as part of the assessment by Campbell, several sites are recorded close to the proposed designations but were subsequently avoided through the Multi-Criteria Assessment (MCA) process,³ redesigning elements away from the historic heritage sites. Avoidance of historic heritage is considered the best form of protection and enhancement of the historic heritage resource under the RMA; we appreciate this approach by the applicant.
- 3.6. I initially reviewed the draft NoRs in October 2023 and confirmed (to the council planner) at that time that there were only TWO recorded historic heritage sites within the Project area and only one of these was identified in Schedule 14 Historic Heritage Schedule to the Auckland Unitary Plan – Operative in Part (**AUP OIP**).
- 3.7. The two historic heritage sites identified by Campbell are:
 - **NoR 6** will encroach into the extent of place of the scheduled Historic Heritage Site *Nehru Hall* (# 2235). The proposed designation also includes temporary use of land for construction works including laydown area. This will affect the brick gateway which is built from the same Huntly bricks as the hall and is assumed to also date to the time of its construction in 1953.⁴
 - **NOR 8** The *Bombay Flour Mill (or Pilgrim’s Mill)*, recorded in the SRS as R12/1208, is in or adjacent to NoR 8. The mill building is probably outside the designation, but features associated with it probably extend into the designation (ibid).
- 3.8. Other than where stated above and for which additional information has been provided, from a historic heritage perspective, I am satisfied that all matters have been addressed in the assessment by Campbell.⁵

4. Statutory considerations

Auckland Unitary Plan (Operative in Part)

- 4.1. I have examined the Project against the following relevant provisions of the AUP-OP:
 - a. Chapter D17 Historic Heritage Overlay and Schedule 14.1 Historic Heritage
 - b. Chapter E11 Regional Land Disturbance
 - c. Schedule 10 Notable Trees
 - d. B5 Regional Policy Statement for Historic Heritage, and
 - e. Chapter E26 Infrastructure.

¹ This document is included with each suite of NoR documents.

² Campbell 2023.

³ Campbell 2023, Section 4.1.7, page 19.

⁴ Campbell2023:19-22.

⁵ Ibid, see footnote 1.

4.2. Overall, I consider the Project to be consistent with historic heritage provisions of the AUP OIP 10 November 2023.

Other statutory documents

4.3. I am familiar with the HNZPT Act 2014, including the sections relating to the process for obtaining archaeological authorities and, as the Applicant has agreed to obtain an Authority from HNZPT, I am satisfied that the proposal is consistent with this Act. Please note the requirement in the Act requiring a stand down period following the granting of an authority and *before commencing* any work on site.

5. Relevant Submissions

5.1. In total, 124 submissions were received for the eight (8) NoRs.

5.2. With reference to Historic Heritage⁶, there were three (3) submissions, all from Heritage NZ Pouhere Taonga (HNZPT). These submissions were contained in NoRs 4, 6 and 8. HNZPT oppose NoR 6 and support NoRs 4 and 8. Each submission is addressed below.

5.3. In the submission for **NoR 4**, HNZPT express concerns regarding two potential pre-1900 villas⁷; NoR is otherwise supported. The submission refers to section 11.10.1.2 in the AEE where NoR-specific construction effects are identified, and inclusion of the following matters in the HHMP are supported:

Item	NoR4 Matters of concern	Remedy requested
1.	Property ID# 608433, Part Lot 30 DP 10637: 199 Paerata Road	Additional research required to assess and clarify if residence is pre- or post-1900 in origin.
2.	Property ID# 608752, Part Allot 30 PSH OF Pukekohe, 131 Pukekohe East Road	Additional research required to assess and clarify if residence is pre- or post-1900 in origin.

5.4. HNZPT also advise (point 10):

...Te Tupa Ngatahi’s recommended wording of draft Condition 22 HHMP, in particular the reference to obtaining an Archaeological Authority under the HNZPTA in point 22(b), and the use of the term ‘unexpected’ in point 22(b)(IX)C.

5.5. The Heritage Unit do not support the replacement of the term “accidental” with ‘unexpected’ as stated in Condition 22(b)(IX)C. This term has no basis in the existing statutory framework and will give rise to confusion between all parties, particularly mana whenua, contractors and subcontractors.

5.6. Moreover, it conflicts directly with the agreed text in Waka Kotahi NZTA’s own P45 Standard and the AUP Accidental Discovery Rule, part of the Auckland Unitary Plan since 2016.

5.7. Changes to text and terminology should be referred to Commissioners during appropriate Statutory reviews and not attempted through other means as they divert attention from Historic Heritage matters.⁸

⁶ RMA Part 1 s2 Interpretation

⁷ Paragraph 12, HNZPT submission (#5) to NoR4.

⁸ See footnote 5.

5.8. A significant matter for concern is the submitter’s statement, between points 12 and 13 of their submission, that:

“Heritage New Zealand seeks the following decision from Council”

5.9. This statement demonstrates the submitter’s misunderstand on the NoR process. Council does not make any decision regarding this, or any NoR application. Council *processes* documentation and Independent Commissioner(s) make *recommendations* to applicants (in this instance NZTA and AT). HNZPT (the submitter) can make application to Waka Kotahi and AT regarding any *decision* those parties make as a result of this NoR process.

5.10. Other than the above issues, I agree with the submitter’s concern around unknown historic heritage across the application area, including pre- or post-1900 residences.

5.11. In submission for **NoR 6**, HNZPT express concern regarding the proposed use of the Nehru Hall property as a work base or site, and the encroachment of the proposed Designation (and implied construction effects) immediately adjacent an unreinforced masonry building.⁹ The NoR is opposed by HNZPT:

Item	NoR6 Matters of concern	Remedy requested
3.	Property ID# 609265, Part Lot 3 DP 887, 59 Ward Street, Nehru Hall. Recommendations in the AEE and supplied conditions do not fully consider or mitigate the known effects that will result from NoR6 on the Nehru Hall and its extent of place	Reconsider the proposed encroachment within the AUP Extent of Place for the Scheduled site. Provide clear mitigation for the known effects that will result from the removal of the gateway entrance and the placement of a major intersection adjacent to Nehru Hall. Work site placement also of concern.

5.12. HNZPT state that the national level importance of this place as it is the site of the very first hall owned and built by the Indian community in Aotearoa New Zealand. The formal entrance from Ward Street has remained unchanged since construction and the setbacks from both sides or the corner form an original spatial relationship between the Hall, the gateway, and the property in general (ibid).

5.13. They request further analysis to determine actual effects and how to mitigate those effects. This matter will be discussed by my Built Heritage Team colleague, Dan Windwood.

5.14. While not part of my subject matter expertise, I concur with this request for further analysis of the effects on AUP Schedule 14.1 #02235, Nehru Hall (and Extent of Place)

⁹ Paragraphs 13-18, HNZPT submission (#8) to NoR6.

at 59 Ward Street, Pukekohe.¹⁰ As this site is scheduled Category B without an identified Primary Feature, all parts are of equal significance.

- 5.15. Additional consultation with and approval from the relevant parties could provide viable alternatives, including identifying a more appropriate work site.
- 5.16. As stated above at 5.8 and 5.9, this NoR application will not be decided by Council.
- 5.17. HNZPT replicate item 5.5 above, the matter will not be repeated only to indicate the inconsistency of the replacement of “Accidental” in an arbitrary and inconsistent manner - in the HNZPT submission the existing statutory sentence at the end of the condition set of point 22 has been copied across:

Accidental Discoveries Advice Note:

*The requirements for **accidental discoveries** of heritage items are set out in Rule E11.6.1 of the AUP.*

- 5.18. The submitter’s (HNZPT) proposed condition for the Nehru Hall (Condition 22 (b) (x)) is appreciated and in general supported; however, I leave any response regarding direct impacts on the building to council’s Built Heritage specialist, Dan Windwood.
- 5.19. In the submission for **NoR8**,¹¹ HNZPT approves of the mechanisms listed in the AEE and condition set and the NoR is supported.

Item	NoR8 Matters of concern	Remedy requested/endorsed
4.	Bombay Flour Mill / Pilgrims Mill (NZAA R12/1208), 144 Mill Road, Bombay . ¹²	Application for Archaeological Authority to allow destruction of any physical remains. ¹³
5.	Possible pre-1900 villa at 188 Mill Road , ¹⁴ Bombay and associated sub-surface remains	Additional research required to assess and clarify if residence is pre- or post-1900 in origin.

- 5.20. As at 5.5 and 5.17, the submitter (HNZPT) draws attention again to the change in statutory terminology. Condition 21 (b)(iii) in the HHMP should be returned to *accidental* in order to maintain consistency with all other statutory frameworks rather than the introduction of the new term “unexpected”.
- 5.21. As stated above at 5.8 (and 5.9) and 5.15, this NoR application will not be decided by Council.
- 5.22. The two errors discussed above have legal implications and require rectification.

¹⁰ Part Lot 3 Deeds 887, Category B, scheduled for A (historical) ,B (social) and F (physical attributes).

¹¹ Paragraphs 9-11, HNZPT submission (#11) to NoR8.

¹² Property ID#11332397 (AC GeoMaps)

¹³ Note: Controlled archaeological investigation (of buildings, structures, or earthworks) is *replacement by record* - the archaeological place is not preserved through this process but replaced by creating a sub-set of the archaeological place.

¹⁴ Property ID#11305495 (AC GeoMaps), PT Allotment 27 Parish Mangatāwhiri District.

6. Affected Parties

6.1. I consider the Franklin Heritage Forum¹⁵ to be affected parties to all NoR.

7. Suggested Conditions

7.1. The Requiring Authorities have presented these and have approached Council to discuss these further. This proposed discussion (December 2023 to be confirmed) is appreciated.

7.2. I do not support the Requiring Authorities (and HNZPT endorsed) change of wording to the HHMP condition discussed above at 5.5, 5.17 and 5.20. This single word change to “unexpected” from the industry standard “accidental” recent and the Heritage Unity consider it implemented without appropriate advice.

7.3. HHMP condition (c) applies to RMA Part 3 s35, *Duty to gather information, monitor and keep records*. To achieve this Duty, a specific role should be identified rather than the current “copies of all reports to be submitted to the Manager.” As this condition is within the HHMP, it is logical to insert a term that clarifies this role to be “Manager Monitoring (for Heritage)”.¹⁶

7.4. In summary, I agree with the suggest conditions pending the proposed discussion and agreement on the issues outlined above.

8. Conclusion

8.1. This Application is for route protection only. The future, staged earthworks along with all construction may require additional Resource Consents and these will be the purview of Council (Auckland and Waikato). As the recommendations from this NoR process will relate directly to these, it is imperative that terminology is correct and legally enforceable.

8.2. It is expected that the eventual OPW will provide an HHMP that will provide appropriate historic heritage management rather that removal / relocation of items, for example, the #02235, Nehru Hall (and Extent of Place) at 59 Ward Street, Pukekohe.

8.3. Some of these areas have been previously disturbed through rural activities; some are pristine. This presents risk of damage or destruction to subsurface, unknown, historic heritage and archaeological objects and sites. This risk can be addressed through the application for an external permit, an Archaeological Authority. This is also recommended by Campbell in his *Assessment of Effects on Historic Heritage*¹⁷ and I agree with this approach.

¹⁵ This umbrella organisation provides supports to several in the Franklin area: franklinheritagenz@gmail.com is listed by the NZ History Federation (nzhistoryfederation.org.nz) to include Franklin Historical Society (franklinhistsociety@gmail.com), Franklin Vintage Machinery Club (www.vintagemachinery.co.nz), the Karaka Historical Society (karakahistoricalociety@gmail.com), Patumahoe History Group (www.patumahoe.org.nz) and Papakura & District Historical Society Inc (pdhs@papakuramuseum.org.nz) to name some of the groups.

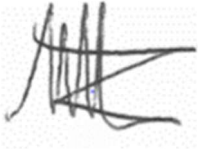
¹⁶ Any external party that requires copies of these document can specify this through a separate legislative process.

¹⁷ See footnote #1.

8.4. The need for the development and incorporation of public interpretation tools across and within this project will help mitigate for the destruction of sites and places and potentially assist in future urban design and community consultation.

8.5. I also agree with the conclusion set out in paragraph 11.10.4 of the Applicant's Assessment of Environmental Effects; with the exception of the two sites stated above¹⁸, all other known heritage places have been avoided.

Signed:



Dated:

6 December 2023

¹⁸ Nehru Hall (NoR6) and Pilgrim's Mill (NoR8).

Technical Memo – Ecology

To	Joe McDougall, Auckland Council
From	Simon Chapman Auckland Council Consultant Ecologist, Ecology New Zealand Limited
Experience/Qualifications	BSc Ecology PG Dip Applied Science Ecology 20 Years Experience. Specialising in terrestrial and wetland ecology
Date	4 2 2023

Requiring Authority	Auckland Transport/Waka Kotahi New Zealand Transport Agency
Application Type	Notice of Requirement NoR
Site Address	Pukekohe Expressway NoR

1. Summary of Proposal

Auckland Transport and Waka Kotahi have collectively lodged eight Notices of Requirement NoRs for the proposed Pukekohe Expressway. Auckland Transport has lodged NoRs, 3, 4, 6 and 7, and Waka Kotahi has lodged NoRs 2 and 8. Part of NoR 8 falls within the Waikato District.

The project, comprising NORs 3-8, will link the proposed Mill Road Corridor, State Highway 22, and Pukekohe town centre by providing an alternative route to State Highway 22. A full description of the proposal, as it relates to ecological effects, is provided in the NoR documents. The NoR documents which have been considered in the preparation of this memo are

- Pukekohe Transport Network *Assessment of Effects on the Environment* Version 1.0 prepared by Alicia McKenzie, Vicky Hu, Helen Hicks and dated 3 09 2023.
- Pukekohe Transport Network *Assessment of Alternatives Report* Version 1.0 prepared by Vicky Hu, Alicia McKenzie, Helen Hicks and dated 3 09 2023.
- Pukekohe Transport Network *Assessment of Ecological Effects* Version 1.0 September prepared by Ian Bredin, Sahar Firoozkoohi and dated 09 09 2023.
- Waka Kotahi New Zealand Transport Agency NoRs 2-8 AC prepared by Waka Kotahi and dated 2 02 2023.

In addition to the above documents Simon also attended the project briefing and project-wide site visit on 29th June 2023 prior to the lodgement of the NoRs.

2. NoRs 1-8 Site Description

The proposal is set across eight interconnected locations between Drury and Pukekohe. It comprises both new construction and upgrade works to form roads, active travel routes and associated freshwater structures such as culverts and bridges. The sites are generally located in semi-rural or future urban zones, with terrestrial habitats across all NoRs identified as brownfield, exotic grassland, scrub, and forest (both native and exotic understorey dominated) as well as planted native vegetation, native and exotic dominated treeland, pūriri forest and taraire, tawa, podocarp forest.

The NoR (WDC) proposal is located along the Pukekohe East Road to Mill Road between Pukekohe East and Bombay along the boundary of Waikato and Auckland Regions.

3. Reasons for Notification

Auckland Transport and Waka Kotahi New Zealand Transport Agency have given Auckland Council notice of requirement for eight new designations as part of the proposed Pukekohe Transport Network.

With regards WDC, This is a review of NoR documents provided by Te Tupu Ngātahi Supporting Growth, for the district consent under the Waikato District Council Plan. Note Any further Resource consent applications under the Regional Authority will be with the WRC.

4. Assessment of Effects on the Environment

a. Fauna

The Requiring Authority has provided an assessment of effects on fauna expected within the footprint and likely zone of influence of the proposal.

The Requiring Authority has stated that there were limitations to assessments of the baseline conditions for fauna. This was largely due to the difficulty in obtaining permission from landowners to undertake surveys and uncharacteristic weather conditions throughout December 2022 and February 2023. Data for fauna was collected from desktop surveys and incidental records in the field. The Requiring Authority has made it clear that fauna surveys and management plans will be submitted during the regional consenting stage.

i. Bats

The assessment identified moderate levels of effect (pre-management) on bats during both the construction and operational phases for all NoRs, except NoR 1. As such, the

ecologist has recommended an Ecological Management Plan to be implemented for all NoRs, except NoR 1.

Specific Bat Management for WDC NoR 1 has been suggested, including the following:

- Consideration to the provisions of the Wildlife Act including the implementation of a vegetation removal protocol (Bat Roost Protocol v2 DOC, 2021) or equivalent version at time of removal.
- Where possible, retain existing mature trees (this is in accordance with the Urban Landscape and Design Management Plan (ULDMP) or the Landscape Management Plan for the Waikato NoR).
- Artificial bat roosts (i.e., bat boxes) should be erected within, or in close proximity to, where suitable roost habitat (i.e., large mature trees) is to be removed in NoR 1. A 1:1 ratio is recommended. The introduction of artificial bat roosts will help to mitigate the short- to medium-term loss of suitable vegetation.

These conditions are considered appropriate for the NoR at present.

ii. Birds

The overall level of pre-management effects on birds both during construction and during operation of the proposal was assessed as moderate for Threatened and/or At-Risk (TAR) species. This assessment is relevant for all NoRs, except NoRs 3 and 4, as it was considered that habitat in these NoRs do not contain suitable resources to support TAR species. In response to the moderate level of effect, measures aimed at managing the project's actual and potential effects on TAR birds have been recommended for all NoRs except for 3 and 4. It should be noted that the assessment categorised all TAR birds as being wetland birds, which ignores the potential presence of Kaka in the Zone of Influence. Additional commentary and impact assessment to include this species should be provided, particularly in relation to NoR 3 where this bird may be present.

iii. Lizards

The ecological assessment considers it likely that both copper skink and ornate skink could be found within all NoRs except NoR 1. The assessment also notes that there is potential for Pacific, forest and Auckland green elegant gecko within forest stands located in the NoR 1 area, including the WDC NoR 1 area, and within the forest stands which border and extend slightly into NoR 4.

The assessment makes the case that the native lizard species potentially present are habitat generalists and, as such, loss of habitat as a result of works is likely to have a negligible effect on these species' populations. The assessment highlights that, with the exception of NoR 1, the loss of lizard habitats will be addressed during regional consenting. Lizard management measures are proposed for NoR 1 because part of that NoR falls within the Waikato District, where lizard habitat removal is a District Plan matter.

The report has identified the need for a Lizard Management Plan for the removal of district plan vegetation at WDC NoR 1.

iv. Native Invertebrates

No field-based surveys were carried out for terrestrial invertebrates, however, data was gleaned from a desktop review which indicated that no native invertebrate species had been recorded within any of the NoR project footprints. The desktop review, in addition to a review of habitat, suggested that effects on invertebrates were likely to be negligible and they were not assessed further in the report.

v. Freshwater Fauna

A field-based assessment was not undertaken to confirm freshwater fauna, however, incidental records were made during site visits carried out to undertake Rapid Habitat Assessments (RHA) of watercourses scheduled to be impacted by proposals. Freshwater fauna records were gained from the New Zealand Freshwater Fish Database (NZFFD) within stream catchments associated with the proposed NoR sites. Two 'At Risk' species, longfin eel and īnanga, were recorded within catchments associated with NoRs 1, 2 and 3 and 1, 2, 3 and 4, respectively.

As well as the At Risk species, a number of other Not Threatened native freshwater fauna records exist across all NoRs, including WDC NoR 1.

As a result of these findings, the report notes that further surveys will be required at the detailed design stage of the project, as well as fish management, silt and riparian condition management. This is considered an appropriate approach for all NoRs, including WDC NoR 1.

b. Flora/Habitats

The assessment identified the presence of Threatened and At-Risk habitats within the NoR footprints including Machaerina sedge land and raupō reedland. In addition to these, a range of exotic and planted habitats are present, such as exotic wetland, exotic scrub and planted native forest. Full site-based delineation assessments of all TAR habitats including wetlands have not been undertaken, therefore, this has been proposed as part of the assessments for the detailed design stage of works for all NoRs, including WDC NoR.

c. Freshwater

The project may impact up to 3 watercourses, ranging from low to high ecological value. Impacts will include stream reclamation, although, exact locations and extents of reclamation are not yet confirmed. The assessment has determined that the project provides an opportunity to restore riparian features along all directly impacted streams. It also notes, however, that full stream assessments will need to be carried out at the detailed design stage for regional consenting on all NoRs, including WDC NoR, to confirm scope and scale of required remediation.

5. Other Statutory Considerations

a. National Policy Statement for Freshwater Management 2020 (NPS-FM) and the National Environmental Standards for Freshwater 2020 (NES-F)

The NPS-FM and the NES-F provide national direction for managing New Zealand's freshwater. This direction includes avoiding any further loss or degradation of wetlands and streams in addition to encouraging their restoration.

The assessment highlights that additional wetland surveys may be required at a future regional consenting stage.

b. Wildlife Act (1953)

Most native birds and all native lizards are absolutely protected under the Wildlife Act 1953. It is an offence to disturb, harm or remove protected wildlife without a permit from the Department of Conservation. Wildlife Act 1953 compliance will be addressed during regional consenting.

c. AUP: OP Regional Policy Statement

The Pukekohe Expressway NoRs relate to district plan matters only. Regional matters will be addressed during a future consenting phase, supported by a detailed CIA.

6. Adequacy of Information

The above assessment is based on the information submitted as part of the NoRs. The majority of this assessment was undertaken prior to the introduction of the NPSIB, thus, additional considerations in line with this document are listed below.

a. Bats

The assessments recommended do not provide full details of proposed further surveys for bats, although, it is recognised that this is difficult to achieve with accuracy prior to the detailed design stage being commenced. In line with NPSIB Policy 7, surveys detailed in Condition 23 should be undertaken at the detailed design stage for each NoR, with the exception of NoR 1. An associated Ecological Management Plan should be created, agreed and adhered to where appropriate. Survey design should be coordinated between NoRs and should be in line with Policy 7 of the NPSIB, specifically, regarding population size, location and usage of the wider habitat.

Additionally, in line with NPSIB Policy 3, appropriate effects management measures for loss of roosting and commuting or foraging habitat should be further considered in light of survey results.

b. Birds

The assessment suggests as New Zealand falcon are a transient species, they do not need to be considered for any of the NoRs. In line with the precautionary principle [NPSIB Policy 3] further explanation is required regarding why this species would not be present in the footprint or Zone of Influence of works, particularly with reference to its diverse breeding site preferences.

c. Lizards

It is agreed that the proposed pre-construction surveys and associated Lizard Management Plan [LMP] are an appropriate approach to determining and managing lizard risks across all NoRs.

d. Native Invertebrates

As no site-based surveys have been carried out and recording of invertebrates is known to be deficient, the results of the data search may not be a true reflection of on-site conditions. In line with Policy 7 of the NPSIB, information is lacking on how the conclusion was reached that native invertebrates are unlikely to be present and do not warrant further consideration.

e. Freshwater Fauna

Specific freshwater field surveys (e.g., eDNA surveys) have not been undertaken across any NoRs, therefore, the distribution of key notable and rare freshwater species across the NoRs may not be accurate. It is agreed that the proposed pre-construction fish salvage surveys are an appropriate approach to determining and managing risks for freshwater fauna across all NoRs, including WDC NoR.

f. Flora/Habitats

It is agreed that the proposed pre-construction wetland delineation surveys are an appropriate approach to determining and managing risks to freshwater inland wetlands across all NoRs, including WDC NoR.

g. Freshwater

It is agreed that the proposed pre-construction SIV surveys are an appropriate approach to determining and managing risks for freshwater environments across all NoRs, including WDC NoR.

7. Submissions

No submissions have been received which relate to ecology.

8. Recommendation

The assessment within this memo has not identified any reasons to oppose the designations sought, subject to appropriate conditions, considering that the potential ecological effects of the Pukekohe Expressway Project will be adequately managed as a result of those conditions proposed.

9. Proposed Conditions

NoRs 1, 3, 4, 5 and 7

Having reviewed the proposed designation conditions for NoRs 1, 3, 4, 5 and 7, in particular, conditions 23 and 24, it is considered that the potential ecological effects resulting from the proposed expressway project are likely to be adequately managed by those conditions.

NoR 6

The proposed designation conditions do not include ecological effects management for NoR 6. It is considered that, notwithstanding the potential requirement to manage ecological effects under regional consenting, the highly urbanised environment means that there is limited potential for adverse ecological impacts within the limits of this NoR.

NoRs 2 and 8

Having reviewed the proposed designation conditions for NoRs 2 and 8, in particular Conditions 22 and 23, it is considered that the potential ecological effects resulting from the proposed expressway project are likely to be adequately managed by those conditions. It is noted that Condition 23(a)(iv) for NoR 8 include requirements for lizard management, however, within the Auckland Region this is only a requirement for consenting at a regional level. It is accepted that the inclusion of this condition ensures alignment with NoR conditions for district plan vegetation removal at WDC NoR 8.

Ngā mihi | Kind regards,

Simon Chapman | Ecologist
Ecology New Zealand Limited – Consultant to Auckland Council

PUKEKOHE TRANSPORT NETWORK

REVIEW OF CONSTRUCTION AND OPERATIONAL NOISE AND VIBRATION ASSESSMENTS

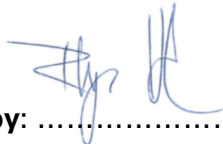
Report No 23055.1v2

Prepared for:

Auckland Council

December 2023

Prepared by:


Rhys Hegley

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1. INTRODUCTION

The Pukekohe Transport Network (the "Project") consists of eight Notices of Requirement ('NoR'), each of which comprises either an alteration to an existing road designation or a new road designation. NoRs 1 and 3 – 7 are being sought by Auckland Transport ('AT') while the remaining NoRs 2 and 8 are being sought by Waka Kotahi NZ Transport Agency ('WK'). Part of NoR 8 is on the boundary between Auckland Council (AC) and Waikato District Council ('WDC'). The remaining NoRs are entirely within the boundary of Auckland Council.

This report provides a technical review of the noise and vibration assessments undertaken for the construction of, and the subsequent operation of, the Project.

2. EXPERIENCE AND QUALIFICATIONS

My full name is Rhys Leonard Hegley. I am a partner with Hegley Acoustic Consultants. I hold a Bachelor of Engineering from the University of Auckland (1993) and have attended specialist courses in acoustics in Australia and America. I am a member of the Institution of Professional Engineers New Zealand.

For the past 23 years I have provided acoustic advice on a wide range of activities such as apartment developments, service stations and workshops through to large scale industrial activities such as petrochemical plants, power stations, dairy factories and roading projects.

My technical skills and experience directly relevant to the current project include the preparation of assessments for the notice of requirement, detailed design or peer review of projects such as Auckland to Botany, Eastern Busway, Drury Arterial Network Project, Northern Corridor Improvements, Southern Corridor Improvements, the SH1 – SH20 link in Manukau, various sections of

the Waikato Expressway, the SH2 Safe Systems Project, SH2 Mangarata upgrade and the Central Motorway Junction.

I attended the project briefing and project-wide site visit on the 29th June 2023 prior to lodgement of the NoRs.

I have read the Code of Conduct for Expert Witnesses contained within the Environment Court of New Zealand Practice Note 2023. I confirm this advice has been prepared in accordance with the Code of Conduct, and is within my area of expertise, except where I explicitly state that I have relied upon information provided to me by another person. I confirm that I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed herein.

3. INFORMATION REVIEWED

The following information was reviewed:

- a. Pukekohe Transport Network: Assessment of Construction Noise and Vibration Effects, September 2023 ('ACNV');
- b. Pukekohe Transport Network: Assessment of Operational Noise Effects ('AONE');
- c. The condition set proposed by AT ('AT Conditions');
- d. The condition set proposed by WK ('WK Conditions');
- e. The general arrangement layout plans for the eight NoRs; and
- f. The submissions.

4. REVIEW OF CONSTRUCTION NOISE AND VIBRATION ASSESSMENT

The following addresses the assessment of construction noise and vibration.

4.1. Clarity of Construction Noise Effects

Sections 6.2.1 – 6.2.8 of the ACNV provide assessments of construction effects for each of the eight NoRs respectively. These assessments are reasonably generic with little information on the actual predicted level of noise/vibration to individual receivers. By way of example, paragraph 6.2.1.1 (NoR 1) reports that:

“Around six existing receivers could experience noise levels that exceed the daytime noise criterion without mitigation. Details of all properties where the criteria could be exceeded are provided in Appendix A”.

“With mitigation in place, as set out in Section 6.3, noise levels of up to 77 dB L_{Aeq} could still occur intermittently at the closest receivers ...”

“Mitigation in the form of barriers can achieve noise level reductions of about 10 decibels. It is therefore predicted that mitigated noise levels can comply with the 70 dB L_{Aeq} noise criterion for most of the construction works”.

In review, Appendix A simply provides a list of receivers where construction noise levels are predicted to exceed 70dB L_{Aeq} with no indication as to the actual level expected by the receiver. The information provided by the ACNV is therefore that levels of up to 77dB L_{Aeq} are expected to the six receivers identified in Appendix A.

In terms of assessing effects, it would be useful for the ACNV to provide more information on noise levels to each receiver, preferably using the same 5dB bandwidths as Table 6-1 (which provides a description of the effects of construction noise). The reason for this is that it is unclear whether the six receivers of Appendix A will all be in the 76 – 80dB L_{Aeq} range, where Table 6-1 reports effects as:

“Continuing office work would be extremely difficult and become unproductive. In a residential context, people would actively seek respite”.

Or whether only the most exposed receiver falls in the above category and the rest are in the lower, 71 – 75dB L_{Aeq} range where the more moderate effects are described by Table 6-1 as being:

“Phone conversations would become difficult. Personal conversations would need slightly raised voices. Office work can generally continue, but 55 dB is considered by the experts to be a tipping point for offices. For residential activity, TV and radio sound levels would need to be raised”.

Essentially, the minimal information provided by the ACNV makes it difficult to determine the effects of the project, either on a global basis, which would be of interest to decision makers, or to individual properties, which would be useful for submitters. Considerable work appears to have been undertaken for the prediction of construction noise, but it has been simplified significantly for the reporting and its subsequent assessment.

With respect to NoRs 4, 5, 6, 7 and 8, the ACNV identifies that “With mitigation in place, as set out in Section 6.3, noise levels over 85 dB L_{Aeq} could still occur intermittently at the closest receivers ...” with NoR 2 specifically identifying 491

Sim Road as a further receiver where levels in excess of 85dB L_{Aeq} are predicted. There are several issues with these sites:

- a) Within the specific assessment sections for each NoR, the effects from such level are described as "*... likely to include loss of concentration, annoyance, and a reduction in speech intelligibility, as well as seeking respite in rooms facing away from construction*". Such a description requires careful consideration so as not to underestimate effects. For example, Table 6-1 of the ACNV attributes such effects to levels that are in the 65 – 70dB L_{Aeq} range. Further, for the 80 – 90dB L_{Aeq} range, Table 6-1 describes construction at such levels as "*Untenable for both office and residential environments. Unlikely to be tolerated for any extent of time*".
- b) The predicted construction noise level is >85dB L_{Aeq} with no indication as to how much higher that 85dB the level actually is. As such, care is required when using Table 6-1 to consider effects as the Table does not extend beyond 90dB L_{Aeq} .
- c) The ACNV provides no indication as to the number (or address) of receivers exposed to levels >85dB L_{Aeq} . Again, such information would be useful to individual submitters who would likely be interested in untenable levels of construction noise to their property. Submitters would likely be of benefit from the ACNV providing noise levels to their dwellings, even if it was in the 5dB bandwidths as Table 6-1 (which provides a description of the effects of construction noise). Specific levels to individual receivers are potentially to be of less relevance to decision makers who are more likely interested in effects as a whole.

In summary, the ACNV provides limited insight into the effects of construction noise and vibration. From reading it, it is clear that effects are likely to be

similar to other roading projects of similar size. There will be varying levels of adverse effects to most neighbouring properties a few who will bear the brunt of construction works. The ultimate response of the ACNV is to propose a Construction Noise and Vibration Management Plan (CNVMP) to address the majority of the effects and Schedules to the CNVMP to address specific construction activities that may arise after the preparation of the CNVMP. These two documents provide a best practice response to dealing with what appears to be some significant, but not unexpected, adverse effects of the Project. The respective conditions describe the consideration of a hierarchy of mitigation to receivers to achieve the best possible outcome, if not compliance with the prescribed noise and vibration limits. This approach is considered a pragmatic one as it provides a method of dealing with an issue that has many unknowns (including the exact method of construction, plant used and future receivers).

Other than amendments to the conditions relating to the CNVMP and Schedules (below) no changes are recommended to the remainder of the construction noise and vibration conditions.

4.2. Mitigation Efficacy

Throughout the assessment of noise effects provided by Section 6.2, the ACNV references barrier mitigation and, more importantly, up to a 10dB reduction from barriers and the associated compliant levels resulting from such barriers. The reality is that a 10dB reduction from a barrier proposed to control construction noise will be difficult to achieve as construction sources are often well elevated (due to the size of the plant, noting that the ACNV provides no information as to the source of the high noise levels). Further, the ACNV correctly states that some sources move linearly meaning barriers may have to be of some length to achieve the intended reductions. In addition, where the construction work occurs within an already developed area, the openings in any barriers required for driveways typically render their mitigation to be all but

negligible. This consideration is particularly relevant for NoR 6 where, without mitigation, 216 receivers are predicted to receive levels above 70dB L_{Aeq} (if work occurs in the most exposed location).

The conclusion of the ACNV that *"it is therefore predicted that mitigated noise levels can comply with the 70 dB L_{Aeq} noise criterion for most of the construction works"* is, therefore, correct for a 10dB barrier, but needs to be read in the context that the mitigation to the degree relied upon is unlikely for all receivers meaning so too is compliance.

One issue not addressed by the ACNV is whether barriers that are proposed for the control of operational noise, could be built at the start of construction, rather than the end. This requirement would be subject to practical considerations but is accepted best practice. As such, an amendment to the CNVMP condition is proposed, as described in section 6 below and the operational noise conditions (section 9 below).

4.3. Clarity of Construction Vibration Effects

As with the noise assessment, the ACNV simply identifies residences where vibration may exceed 5mm/s (without defining the magnitude of the exceedance). Similarly, for commercial buildings, those predicted to receive more than 10mm/s are identified, but not the actual limit.

As with the noise assessment, there is limited information with which to gauge the actual effects. The approach that the ACNV takes instead is that any effects will be managed through the CNVMP and its Schedules. In terms of amenity effects, such an approach is considered appropriate, for the same reason as described for the noise assessment in section 4.2 above. However, vibration differs from noise in that, in addition to amenity, it requires consideration with respect to building damage. Based on the assessment provided, building

damage must be considered a realistic possibility (based on vibration >10mm/s). The management approach suggested by the WK condition 18 is to assess and then monitor the effects of doing so. The comparable AT condition relies upon a Schedule to, presumably, do the same.

Without knowing the magnitude of the vibration, to permit and then monitor the activity introduces the risk that there is damage to buildings that must then be remediated. Any such damage is likely to be cosmetic (cracked plaster) meaning such remediation is, in all likelihood, practicable.

One change to the conditions recommended is to AT 19 where the procedure to follow in the event of the Category B levels being exceeded be replaced by the comparable WK condition (18).

4.4. Night Works

The ACNV identifies the likelihood of night works, noting the difficulties with such work. It is accepted that, for practical reasons, night works cannot be avoided, for example where road closures are required. However, what must be avoided is the use of night works as a means of meeting a construction programme. As such, amendments for the CNVMP and Schedule are proposed below.

5. SUBMISSIONS

The submissions relating to construction effects were general in nature and are not responded to directly.

6. CONSTRUCTION NOISE AND VIBRATION CONDITIONS

The following changes to the proposed conditions are consistent with the review presented in section 4 above.

CERTIFICATION DEFINITION

'Certification' in both the AT and WK conditions is defined as requiring confirmation from Council that the CNVMP/ Schedule has been prepared in accordance with the relevant condition. It is simply noted that confirmation differs from certification and somewhat lessens Council's control over the final product, noting that this definition applies to all Plans required by the conditions.

It is a more important point that while the AT conditions anticipate Council confirmation of the Schedules, the WK definition excludes Schedules from requiring confirmation. As Schedules are expected to cover the high noise and/or vibration activities, it is the Scheduled activities that will require the most scrutiny. WK's response to a similar query on previous NoRs has been that their internal process is robust enough not to require Council oversight. This is inconsistent with the acceptance of Council input to the CNVMP. Further, given the lapse dates of the NoR, it is difficult to see how the current confidence can be extended into the future.

It is recommended that WK definition of Certification match that of AT. This change also necessitates an amendment to WK 20 (as described below).

CONDITION AT 19

Condition AT 19 states that should vibration not comply with the conditioned limits, a Schedule should be prepared. The comparable condition WK 18 includes two further requirements (18(b) and 18(c)) that set out the assessment and monitoring requirements for a situation where vibration exceeds the Category B criteria. While, presumably, these same criteria would be covered by the Schedule, adding the two additional criteria to the AT set would add clarity to the conditions, and is recommended.

CONDITIONS AT 18– 21 and WK 17 - 20

There appears to be an inconsistency in both condition sets, with the following using the AT set as an example. Firstly, the noise (18) and construction (19) conditions both provide objective criteria to be complied with, where practicable. Where not, the reader is directed to the Schedule condition (21). Condition 21 states that 'Unless otherwise provided for in a CNVMP ... a Schedule shall be prepared' for the activity in question. The issue appears to be that while the latter condition 21 expects the CNVMP to be able to address some high noise/ vibration activities, the earlier conditions do not.

One option would be to provide conditions 18(b) and 19(b) the ability to allow higher noise levels through a CNVMP, as follows:

18(b) Where compliance with the noise standards set out in Table 18.1 is not practicable, and unless otherwise provided for by the CNVMP, the methodology in Condition 21 shall apply.

19(b) Where compliance with the vibration standards set out in Table 19.1 is not practicable, and unless otherwise provided for by the CNVMP, the methodology in Condition 21 shall apply.

Further clarity could be added to Condition AT 20 by noting that, in some instances, the CNVMP can enable levels in excess of AT 18 and 19. The following bullet point could be added between current bullet points (v) and (vi):

- *Predicted noise and/or vibration levels, where these exceed the limits of conditions 18 and 19.*

For completeness, 20(x) could be expanded to make it clear that the CNVMP permits exceedances by adding the following to the current condition:

(x) ... will not be practicable, and where not addressed by the CNVMP.

The same changes would also clarify the corresponding conditions WK 17, 18 and 19.

CONDITION WK 20

As discussed above with respect to the WK definition of certification, it is recommended that condition WK 20 be amended to require certification of Schedules, as follows:

20(c) the Schedule shall be submitted to the Manager for information certification at least 5 working days ...

CONDITIONS AT 20 & 21 and WK 19 & 20

As described in section 4.4 above, it is recommended the CNVMP and Schedule conditions of both the AT and WK sets be updated to clarify that the intent of night works is to undertake activities that cannot practically be undertaken during the day, rather than programming reasons.

With respect to AT 20 and WK 19, the following addition is proposed to part (c):

(c) The objective of the CNVMP is to provide a framework for the development and implementation of the Best Practicable Option for the management of construction noise and vibration effects to achieve the construction noise and vibration standards set out in Conditions 18 and 19 to the extent practicable. With respect to night works, the CNVMP can only authorise exceedances of conditions 18 and/or 19 for works that, for reasons limited to safety or practicability, cannot be undertaken during the day time. To achieve this objective, ...

For AT 21 and WK 20, a similar addition is proposed to part (b):

(b) *The objective of the Schedule is to set out the Best Practicable Option measures to manage noise and/or vibration effects of the construction activity beyond those measures set out in the CNVMP. With respect to night works, Schedules can only authorise exceedances of conditions 18 and/or 19 for works that, for reasons limited to safety or practicability, cannot be undertaken during the day time. The Schedule shall include details such as: ...*

7. REVIEW OF OPERATIONAL NOISE AND VIBRATION ASSESSMENT

7.1. Operational Noise

The following addresses the assessment of operational noise.

7.1.1. Future Environment

RECEIVERS ARRIVING BETWEEN DESIGNATION AND CONSTRUCTION

Section 5.1 of the ACNV specifically requires dwellings built between designation and construction of the various NoRs to be included in the future assessment of construction noise and vibration. This approach is supported by the proposed conditions. However, the AONE takes a different view. While the AONE discussed (section 3.1.2) the adoption of a low noise road surface across all NoRs for the control of noise to current and future receivers, it does not require the assessment of future noise sensitive activities that arrive between designation and construction. The rationale for this approach is that it is in accordance with the definition that NZS 60806¹ provides for a PPF².

¹ NZS 6806: 2010 Acoustics - Road-traffic noise - New and altered roads

The issue with the proposed approach is that road surface alone may not achieve a reasonable level of noise to these future dwellings. Under the current proposal, and assuming that WK/ AT submit on the future Plan Changes for a provision that future noise sensitive buildings incorporate their own mitigation to control noise from the unbuilt road, those developing the land in the future could potentially end up providing a significant portion of the necessary mitigation.

To a certain extent, there is logic to the proposed approach as those moving into the area would have knowledge of the future road. The requiring authority's approach is that those future dwellings should incorporate their own mitigation, such as barriers (which are addressed below) and/or façade mitigation. The practical issue with this approach is that, other than the AONE (which may be difficult for a developer to locate in the future), there is no method by which those building houses prior to the road's construction can determine the noise the house would be exposed to. In other words, asking future developers to design for road traffic noise would likely be impracticable.

There are two possible options to address this issue. Firstly, the definition of a PPF could be amended to include not only the current PPFs, but also those that arrive up until the final design is undertaken. This places the onus of meeting appropriate noise levels at future PPFs on the requiring authority. The second option, and one that has been discussed with AT/WK on previous projects, but not yet implemented, would to require the future developers to provide the necessary mitigation in the same way that is currently proposed. To do this, the requiring authority would make the current noise contours³ publicly

² Protected Premises and Facilities

³ Appendix B of the AONE

available. This could potentially be achieved through a layer on the AUP⁴ zoning maps or appending them to the conditions. The risk with this option is that the noise from the road may change between the current and final designs. A possible means of offsetting this risk would be to add a small (2dB) factor of safety to the current contours.

Of the two options described above, section 9 below suggests an amendment to the definition of PPF on the basis that publishing the noise contours is beyond the scope of this review.

Ultimately, whether the PPFs built between designation and construction are considered at all is an issue that is wider than acoustics as it has planning and legal implications.

SHARED RESPONSIBILITY TO MITIGATION

The AONE approach to road noise mitigation for all future PPFs, whether they are built between designation and construction or as part of some future development⁵, is to share the burden of mitigation between themselves and the adjacent landowners. This shared responsibility is considered necessary for roads as it is typically not practicable to internalise their noise effects. The AONE describes this shared responsibility as the requiring authority providing a low noise road surface and the adjacent landowners addressing any remaining effects. Notwithstanding the practical issues that this imposes on some landowners (which is addressed above), there is merit in considering the contribution of the requiring authority to this shared arrangement.

⁴ Auckland Unitary Plan – Operative in Part

⁵ Such as within the Rural or Future Urban zone

S16 of the RMA requires every occupier of land to adopt the best practicable option to control noise while s17 requires every person to avoid, remedy or mitigate any adverse effect carried out on behalf of that person. The offered road surface mitigation is considered consistent with s16 and s17. However, the duty to satisfy s16 and s17 is not confined to road surface meaning if there are any other mitigation options that would be effective and which could be installed as part of the road construction, they too must be considered and would contribute to the requiring authority's share of the mitigation burden.

Barrier mitigation has the potential to be effective at controlling road traffic noise, particularly to the as yet undeveloped Future Urban Zone (FUZ). It is, however, recognised that barriers require a number of considerations when determining their practicability, including sight lines, openings for driveways, foundations and urban design. However, if barriers were found to represent the Best Practicable Option (BPO) for a particular area, it is difficult to see how the mitigation should not fall to the road maker to install, rather than some developer at a later date.

Essentially, if a barrier is to be installed between say a subdivision and an adjacent road and that barrier would provide a reasonable level of noise protection, it is proposed that the barrier be the responsibility of the noise maker rather than the future developer. In such a manner, the requiring authority can be considered to have done all that is practicable to control noise leaving any remaining portion to the adjacent landowner.

While the currently proposed conditions do not preclude such barriers, they do not encourage their consideration. By way of example, conditions AT 28 and WK 27 require the future design to achieve the Noise Criteria Categories of the current design (which are attached as schedules to the conditions). Table 3-1 of the AONE shows that for new roads, Noise Criteria Category A includes all levels up to 57dB while Noise Criteria Category B ranges from 57dB to 64dB.

The corresponding ranges for altered roads use higher levels. The potential issue can be highlighted by considering a PPF within Category B that is currently predicted to receive a level of 58dB. If, through a change during the detailed design, this level should increase by say 5dB to 63dB, it would remain within Category B, meaning the need for mitigation would be discretionary.

To address this, an additional condition is proposed (section 9 below) that highlights the requirement to consider barriers during the final design. This condition is written with the intention of supporting barriers to screen land that is undeveloped but where noise sensitive activities can reasonably be expected. On this point, it is not necessary for PPFs to actually exist prior to the design of the barrier. Structure Plans typically provide the key design inputs such as site density, boundary setbacks and building height limitations that essentially provide an envelope in which a PPF could exist. While such information may not allow the exact level of noise to be calculated to a particular future PPF, it would be ample for determining whether a barrier would be of acoustic benefit to a community and, therefore, would provide for a BPO assessment.

7.1.2. Noise Criteria Categories

The above section provides an example of how the proposed conditions' use of Noise Criteria Categories provide considerable scope to the noise level that PPFs could experience. As a result, decision makers and submitters need to be aware that they are considering a range of noise levels rather than the specific levels provided in the AONE.

One method of providing a greater degree of certainty in the conditions would be to amend AT 28 and WK 27 so that instead of requiring the final design to maintain the current Noise Criteria Category, they instead achieve the currently predicted noise levels (Appendix A) plus a small (2dB) factor of safety to allow some changes to the design. A suitable condition is suggested in section 9

below. It is noted that conditions AT 31 and WK 30 provide for the situation where the design changes to the extent that the criteria cannot be met.

7.1.3. Road Surface

The WK road noise surface condition (WK 26) is simple and easily understood and, other than discussed in section 7.1.4 above, is supported. By contrast, the comparable AT 27 has been well canvassed during other projects where it was not considered to be fit for purpose. The issues are:

- a) Part (b) relies on any update to the Auckland Transport Reseal Guidelines, which are unknown;
- b) Part (b)(i) only requires roads carrying in excess of 10,000 vehicles per day to be resealed with a low noise road surface⁶. As an example, the noise from a road with 9,000 vehicles per day travelling at 50km/hr with 5% Heavy Commercial Vehicles to a PPF 15m from the road with a low noise road surface would be 60dB $L_{Aeq(24\text{ hr})}$. This level would increase to 64dB $L_{Aeq(24\text{ hr})}$ should a reseal use a standard two-coat chip seal. It is hard to see the justification for resealing a road with a lower performance road surface at some point in the future when the NoRs are based on a higher performance road surface. This would appear inconsistent with S16 and s17 of the RMA.
- c) Parts (b)(ii) – (iv) describe situations where the low noise road surface could be replaced with a poorer performing surface. Situations, such as the addition of a cul de sac (b(ii)), are unlikely to arise between the road being built and resealed meaning their inclusion in the conditions is of little use. Should another of the identified situations occur

⁶ Condition AT 27 describes asphaltic concrete (or an equivalent low noise road surface) as being a low noise road surface for the purpose of this condition.

(development into an industrial or commercial area (b(iii)) or town centres, hospitals or schools (b(iv))), any proposal change to the noise mitigation should include a consideration of noise effects as opposed to the blanket statement currently proposed. Instead, part (c) simply requires Council to be advised.

In section 9 below, it is recommended that the AT road surface condition be amended to match that of WK.

7.1.4. First Year After Opening

The analysis presented in the AONE is based on a low noise road surface. Section 6.9 explains that the various roads would in fact be constructed with a noisier chip seal and that sometime within 12 months of opening the road would be resealed with a low noise road surface (conditions AT 27 and WK 26). Section 6.9 explains that the effect of the chip seal alone is a 4 – 6dB increase in noise to PPFs but that this increase is partially offset by a slight reduction in noise due to lower traffic volumes than for the reported 2048 design year. The net result is that all PPFs will experience levels 2 – 4dB above those reported in Appendix A and B of the AONE.

The AONE also notes that a small number of PPFs would move up a Noise Criteria Category, eg from A to B or B to C⁷. The conclusion of the AONE is that the effect will be temporary, only likely to affect new, rather than widened, roads, and will be managed at the time of detailed design.

In terms of the temporary nature of the noise, the conditions allow such elevated levels for 12 months, which extends beyond what could be reasonably considered to be temporary. Further, experience with other roads has shown

⁷ Table 3-1 of the AONE provides a full description of the Noise Criteria Categories

that, particularly for new roads, any issues with noise occur at opening (ie within the 12 month period) when the new noise source is introduced. To allow the noise over this period to be elevated must increase the risk of disturbance to neighbours, particularly those exposed to the higher levels.

As written, the conditions do not appear to allow for an increase in the Noise Criteria Category as they require compliance with the criteria provided in the current design, without a dispensation over the first year. It is, therefore, not clear how the requiring authority intends to comply with the suggested conditions, other than by demonstrating it is not practicable to comply with them and altering the criteria in accordance with AT 31 and WK 30.

7.1.5. Assessment of Effects

The AONE uses two tools with which to assess the effects of the Project. Firstly, it provides an assessment in accordance with NZS 6806. The focus of this standard is on the enablement of roads rather than providing for a full assessment of noise effects. Its shortcomings for this purpose have been well canvassed by Boards of Inquiry for both the Waterview Connection Proposal⁸ and the Transmission Gully Proposal⁹.

The second assessment approach is to compare the noise from the new road with the Do-Nothing scenario, noting that this comparison scenario assumes full development of the surrounding area with the corresponding traffic using

⁸ <https://www.epa.govt.nz/assets/FileAPI/proposal/NSP000012/Boards-decision/ec6f94077d/Waterview-Final-decision-volume-1-Report-and-decision.pdf> from paragraph 925.

⁹ <https://www.epa.govt.nz/assets/FileAPI/proposal/NSP000028/Hearings-Week-01/23871c7f27/01-applicants-casebook-11-Transmission-Gully-Proposal-Final-Decision.pdf> from paragraph 569.

the existing road network. As such, the changes in level would generally be less than if compared to the existing noise levels.

The following Table summarises the range of noise levels that the existing PPFs will be exposed to as a result of each of the NoRs.

Table 1. Summary of Noise Levels

NoR	Predicted Range of Project Noise Levels (dB L _{Aeq(24 hr)})	
	Altered Road	New Road
NoR 1	41 - 58	-
NoR 2	49 - 64	42 - 64
NoR 3	-	33 - 46
NoR 4	41 - 64	50 - 51
NoR 5	41 - 63	42 - 48
NoR 6	NA	NA
NoR 7	39 - 63	49 - 55
NoR 8 (AC)	48 - 66	-
NoR 8 (WDC)	48 - 64	-

In terms of assessing effects, an internal level of 40dB L_{Aeq(24 hr)} is generally considered to provide an appropriate level of internal amenity. It is the level that WK typically promote as the internal criterion for any houses proposed near their network. On the basis that an open window provides in the order of

a 15dB reduction¹⁰, it can be seen that external levels of up to 55dB $L_{Aeq(24 \text{ hr})}$ can be considered to result in effects that are reasonable.

The corollary of this is that levels above 55dB $L_{Aeq(24 \text{ hr})}$ can be considered to have an adverse effect. As pointed out throughout the AONE, noise from the project needs to be considered within the existing noise environment which, particularly in the case of altered roads, may already be high (albeit due to traffic noise). The conclusion is, therefore, that road traffic noise as a result of the various NoRs will produce undesirable levels of noise to some PPFs and that the effects can be considered to be adverse. Again, the AONE points out that it is not possible for the road to internalise its effects meaning after implementing the BPO, the effects remain. It also supports to the discussion in section 7.1.1 above about the importance of the balance between the sharing of mitigation effects.

7.2. Operational Vibration

The AONE considers that vibration resulting from the use of the road will meet all reasonable expectations of it. This is consistent with other projects and appears reasonable. Vibration is, therefore, not discussed further.

8. SUBMISSIONS

The submissions relating to operational effects were general in nature and are not responded to directly.

¹⁰ It is generally accepted that a façade with windows open for ventilation will reduce external noise within a building by approximately 15dB. This reduction is independent of façade construction as it is the open window that controls the mitigation available. "Testing of the sound attenuation of the external envelope of six houses" by George Bellhouse for the Building Industry Authority, March/ April 2000 demonstrates this.

9. OPERATIONAL NOISE CONDITIONS

The following changes to the proposed conditions are consistent with the review presented in section 7 above.

CONDITION AT 27

As discussed in 6.1.3 above, it is recommended that condition AT 27 be replaced with WK 26.

UNNUMBERED CONDITION BETWEEN AT 27 & 28 AND BETWEEN WK 26 & 27

As discussed in section 7.1.1 above, it is recommended that the definition of a PPF in the unnumbered condition should be amended by deleting part (j), the clarification to the NZS 6806 definition of PPF.

This necessitates further changes to subsequent conditions as the Noise Criteria Categories will not exist for future PPFs.

CONDITION AT 28 / WK 27

In response to paragraph 6.1.2, it is recommended that, in addition to Noise Criteria Categories, the additional criteria of the current predicted noise levels +2dB is added, as follows (which also corrects some drafting errors):

The Noise Criteria Categories identified in Schedule [3]: Identified PPFs Noise Criteria Categories at each of the PPFs shall be achieved where practicable and subject to Conditions 27 to 39 (all traffic noise conditions). In addition, noise to all PPFs shall not exceed the Predicted noise levels for all PPFs in Schedule [x] plus 2dB. Where PPFs are not identified in Schedules (3) or [x], the design shall be in accordance with the Best Practicable Option.

~~(a) The Noise Criteria Categories above criteria do not need to be complied with at a PPF where:~~

~~(b) (a) The PPF no longer exists; or~~

~~(b) Agreement of the landowner has been obtained confirming that the Noise Criteria Category does not need to be met.~~

~~Achievement of the Noise Criteria Categories design criteria for PPFs shall be by reference to a traffic forecast for a high growth scenario in a design year at least 10 years after the programmed opening of the Project.~~

The above condition will require Appendix A of the AONE to be added to the condition set as Schedule [x].

CONDITIONS AT 29 & 30 and WK 28 & 29

The same changes are proposed for these two conditions. The first change is to modify them to represent the suggested change to the PPF definition. The second change is to highlight that mitigation should be considered to the as yet undeveloped areas where noise sensitive activities can be realistically expected (section 7.1.1 above). The suggested change refers to 'future residential areas' as development of the FUZ may include non noise sensitive uses.

AT29/WK28 As part of the detailed design of the Project, a Suitably Qualified Person shall determine the Selected Mitigation Options for the PPFs identified on Schedule [3]10: Identified PPFs Noise Criteria Categories.

For the avoidance of doubt, the low noise road surface implemented in accordance with Condition 27 may be (or be part of) the Selected Mitigation Option(s). [WK28 only]

In situations where the project passes through future residential areas, noise barriers shall be included in the Selected Mitigation Options where they can be demonstrated to provide the Best Practicable Option for the control of road traffic noise given its intended future residential use.

AT30/ WK29 Prior to construction of the Project, a Suitably Qualified Person shall develop the Detailed Mitigation Options for the PPFs identified in Schedule [3]11: Identified PPFs Noise Criteria Categories, taking into account the Selected Mitigation Options.

In situations where the project passes through future residential areas, noise barriers shall be included in the Detailed Mitigation Options where they can be demonstrated to provide the Best Practicable Option for the control of road traffic noise given its intended future residential use.

CONDITION AT 31 and WK 30

This condition specifically requires that should, during detailed design, the required mitigation change significantly, the new design must comply with the "... Best Practicable Option in accordance with NZS 6806 ..." Bullet point 6 of Paragraph 925 of the Waterview decision⁷ is clear that NZS 6806 "Inadequately address[es] s16 RMA ("duty to adopt ... the best practicable option "" BPO") ..." As such, it is recommended that the condition should be amended to delete the reference to NZS 6806. It would read as follows:

If the Detailed Mitigation Options would result in ~~the Identified Noise Criteria Category changing to a less stringent Category, e.g. from Category A to B or Category B to C,~~ an increase in noise level at any relevant PPF,

compared to the design criteria of condition AT 28/WK 27, a Suitably Qualified and Experienced Person shall provide confirmation to the Manager that the Detailed Mitigation Option would be consistent with adopting the Best Practicable Option in accordance with NZS 6806 prior to implementation.

CONDITION AT 32 and WK 32

It is suggested that this condition be modified slightly to highlight that, should it be practicable and effective, barriers intended for the control of operational noise will be built to also screen construction noise.

The Detailed Mitigation Options shall be implemented prior to completion of construction of the Project and, where practicable and effective, prior to the commencement of construction. ~~with the~~ The exception of is any low-noise road surfaces, which shall be implemented within twelve months of completion of construction.

02 December 2023

To ☐ Karen Bell, Stantec, Reporting Planner

From ☐ Wes Edwards, Arrive Ltd, Technical Specialist ☐Transport

Subject: Notices of Requirement – Pukekohe Transport Network - Transport Review

1 Executive Summary

- ☐☐ At the request of Auckland Council and Waikato District Council the councils have undertaken a review of notices of requirement for the Pukekohe Transport Network in relation to transport effects.
- ☐2 After reviewing the notified material and submissions I have a few concerns about transport matters, recommend some additional information be provided, recommend some designation boundaries be altered, and recommend some amendments to conditions.
- ☐3 I have a concern around the safety of the active mode path proposed in the ☐Pukekohe South West Upgrade Project. In my view the location of the path close to the property boundaries in combination with multiple residential driveway presents a significant hazard and adverse effect on safety. I conclude the Project is inconsistent with its stated Purpose.
- ☐4 Most of the Projects will, or will have the potential to, remove right turn movements at driveways and some side roads due to the introduction of median islands or median barriers. The assessment considers the impact of these changes relying on the presence of roundabouts at multiple key intersections however, the decision to control these intersections with roundabouts is understood to be preliminary, and if changed to another form such as traffic signals the impact of removing right turn movements from driveways could be significantly worse.
- ☐☐ Subject to those concerns, and a number of relatively minor caveats, I find the assessment of transport effects to be broadly acceptable.
- ☐☐ The designation footprints for the Projects are based on initial concept designs which are subject to change and refinement as the design and approval processes progress in future. A number of future design decisions have the potential to significantly change the impact on several properties. These decisions include the form and width of active mode facilities and the methods for addressing height differences. The concept designs almost universally use embankments for addressing height differences and in some locations the use of an alternate method such as retaining walls or bridge structures could significantly change the impact on some properties.
- ☐7 I consider the assessment of alternatives to be generally adequate at the larger scale subject to some more information about possible alternative alignments in two locations. Due to issues such as those discussed above, I consider additional assessment of alternative methods in relation to detailed impacts on several properties is warranted.
- ☐☐ I consider most of the Projects to be reasonably necessary, although subject to further information about the ability to reduce the area of land required from some properties in relation to alternative methods, at the detailed level some parts of some designations may not be reasonably necessary, and I recommend one change to a designation boundary.
- ☐9 As the ☐Pukekohe South West Upgrade project has, in my view, adverse safety outcomes I consider it is contrary to the stated Purpose and is therefore not reasonably necessary.
- ☐☐0 I recommend that additional information is provided about several aspects. These are discussed in the body of the report and summarised in the conclusion.

☐

□□□ I make recommendations for changes to the condition relating to existing property access and to the Construction Traffic Management Plan conditions.

□□2 My recommendations are□

- | | |
|---|---------------------------------|
| a□ □□Drury West Arterial. | Approve with amendments |
| b□ 2□Drury□Pukekohe Link | Additional information required |
| c□ 3□Paerata Connections | Approve with amendments |
| d□ 4□Pukekohe North□East Arterial | Additional information required |
| e□ □□Pukekohe South□East Arterial | Additional information required |
| f□ □□Pukekohe South□West Upgrade | Additional information required |
| g□ 7□Pukekohe North□West Arterial | Additional information required |
| h□ □□Mill and Pukekohe □ast Roads Upgrade □Auckland | Additional information required |
| i□ □□Mill and Pukekohe □ast Roads Upgrade □Waikato | Additional information required |

2 Introduction

2.□ At the request of Auckland Council and Waikato District Council [the councils] have undertaken a review of notices of requirement [NoRs] for the Pukekohe Transport Network in relation to transport effects.

Qualifications and Experience

- 2.2 I hold a New Zealand Certificate in Civil Engineering, and a Bachelor's degree in Civil Engineering. I am a Chartered Professional Engineer and an International Professional AP□C□□engineer.
- 2.3 I am an Engineering New Zealand Fellow and a Professional Member of the Institute of Transportation Engineers.
- 2.4 I have over 3□ years engineering experience, with 32 of those years as a transport specialist based in Auckland. My current role is Transportation Advisor and Director of Arrive Limited, a company which I founded in 2002.
- 2.□ I am a road safety auditor, have experience in collision investigation and road safety engineering, am accredited by KiwiRail as a Level Crossing Safety Impact Assessor, and have formerly been accredited by Waka Kotahi New Zealand Transport Agency [NZTA] as a Traffic Controller, Inspector, and Site Traffic Management Specialist.
- 2.□ I have experience in the design of transport infrastructure including intersections controlled by traffic signals or roundabouts, the design and layout of streets and neighbourhoods, the design of bus interchanges, bus priority measures, active modes lanes and paths, and parking facilities.
- 2.7 I have experience in traffic engineering and transport planning matters associated with resource management, including resource consents, structure plans and plan changes, and notices of requirement for road infrastructure, rail infrastructure, and schools□
- 2.□ I have provided specialist opinions on traffic and transport matters as an expert witness in council, District Court, Environment Court, Land Valuation Tribunal, Environmental Protection Agency Board of Inquiry, and High Court proceedings.

- 2.9 I was formerly accredited by the Ministry for the Environment as a Resource Management Act Hearings Commissioner.
- 2.10 My work experience relevant to this matter includes
- a Advising Auckland Council or private parties on several private plan changes and significant developments in southern Auckland, including
 - i Anselmi Ridge subdivision, Pukekohe, 2000
 - ii Pokeno Village Plan Changes, subdivisions, and District Plan review, 2007-22
 - iii Pukekohe West (Belmont) Plan Change, 2007-2009
 - iv Franklin 2 Precinct (Paerata Rise) SHA Plan Variation, 2000-20
 - v PC Patumahoe South, 2009-22
 - vi PC Waipupuke (Drury West), 2020-2
 - vii PC9 McLaren Rd, Glenbrook Beach, 2023.
 - b Advising councils and private parties on Notices of Requirement (NoRs) for schools, rail infrastructure projects, and arterial road infrastructure projects including
 - i NZTA NoRs for widening of State Highway One in Whangarei, 2000
 - ii KiwiRail NoRs for North Island Main Trunk Wiri to Quay Park, 2020-202
 - iii KiwiRail NoRs for Ngākōroa (Drury West) station and interchange, 2020-2023
 - iv NZTA NoR Warkworth – Te Hana motorway, 202
 - v NZTA NoR for SH SH29 intersection, 2022
 - vi Auckland Transport NoRs for Southern Frequent Transport Network, 2023
 - c Advising councils and private parties on numerous development projects.

Involvement in this Matter

- 2.11 I was engaged by the councils in early 2023 to advise on this plan change and participated in discussions about the projects prior to the lodging of the notices. I am broadly familiar with the road network in the area and attended the project briefing and project-wide site visit on 29 June 2023 prior to lodgement of the Notices.
- 2.12 In writing this memo, I have reviewed the following documents relating to the Plan Change
- a Form Notice of Requirement for each of the eight NoRs
 - b the Assessment of Environmental Effects (AEE)
 - c the Assessment of Alternatives (AOA) appended to the AEE
 - d the Assessment of Transport Effects (ATE)
 - e the proposed conditions included with the notified material and
 - f submissions relating to transport.

Exclusions

- 2.3 The consideration of some matters is outside the scope of this report or my expertise. I do not consider
- a matters relating to noise, dust, or light spill generated by vehicle movements
 - b matters relating to stormwater runoff
 - c matters relating to road pavement structure or integrity, earthworks or structures
 - d the affect of traffic on amenity, except in the general context of street design

Outline

- 2.4 This review considers transport matters common to all eight Projects and also considers aspects of each Project separately.
2. The outline of this report broadly follows the Auckland Council specialist report pattern and includes the following sections
- a an overview of the key transport issues for these notices (Section 3)
 - b a summary of the Projects (Section 4)
 - c a summary of the requiring authorities' (RA's) transport assessment (Section 5)
 - d additional description of the transport environment (Section 6)
 - e a summary of the assessment of alternatives (Section 7)
 - f my review of operational transport effects and management methods (Section 8)
 - g my review of construction transport effects and management methods (Section 9)
 - h statutory considerations (Section 10)
 - i a review of transport matters raised in submissions and by the Local Board (Section 11 and 12)
 - j a review of the proposed conditions (Section 12)
 - k conclusions and recommendations (Section 13)

Terminology

2. In this report "active mode" refers to travel by walking, cycling, scooters, mobility devices and similar modes of transport. Where locations or organisations have multiple or alternative names I generally refer to the formal or legal name. A glossary of terms and abbreviations is appended.

3 Key Transport Issues

Provision for Growth

3. The Auckland Region has experienced high rates of population growth over the past decades, and growth is expected to continue at relatively high rates into the future. Policies and strategies at both a national and regional level are focussed on providing for a significant

proportion of that growth through intensification within the existing urban footprint, supplemented by “greenfield” growth in some rural areas around the periphery of the city.

- 3.2 Pukekohe is referred to as a satellite town that is expected to accommodate a significant portion of growth in the southern Auckland region, along with greenfield areas in Drury, Paerata, and on the outskirts of Pukekohe.
- 3.3 The northern Waikato region is also expected to have high growth rates extending into the future and the region is planning for expansion of existing towns and villages including Pokeno, Tuakau and Buckland in the northern part of the region.
- 3.4 Population growth results in increased demand for travel. Travel enables people and communities to provide for their social, economic and cultural wellbeing, and has the potential to adversely affect those matters, health and safety, and the natural environment.
- 3.□ The Projects proposed to be enabled by the NORs are intended to accommodate the increased demand for travel generated by the growth expected to occur in the southern Auckland and northern Waikato regions while addressing some of the adverse effects of that increase. For that reason alone the Projects have significant benefits.
- 3.□ Auckland Council has a number of plans and strategies that must be considered. As the ability to fund and construct bulk infrastructure to support growth is limited, Auckland Council has recently adopted a new Future Development Strategy [FDS] that replaces the former Future Urban Land Supply Strategy [FULSS] that was the relevant document throughout assessment and analysis of the Projects through to notification.
- 3.7 High-level structure planning for the areas the Projects are located in has been undertaken as part of the Drury-Opāheke Structure Plan (DOSP) and Pukekohe-Paerata Structure Plan [PPSP] both of which were supported by an extensive but high-level Integrated Transport Assessment [ITA]. That work has considered possible land use patterns and the structuring of infrastructure, with the planned transport network being a key consideration in the determination of the projects.
- 3.□ A key issue for these NORs is the inter dependency of this set of Projects with the manner in which the forecast growth occurs.

Project Interdependencies

- 3.9 The eight Projects are part of a wider-ranging suite of projects that are intended to address and enable growth. Some of those projects are being constructed at this time [for example rail electrification, widening of the Southern Motorway between Papakura and Drury, and Paerata Station] others have designations in place [e.g. Drury Arterials] and others are planned to be addressed in parallel with these NORs, or in the future [e.g. widening of the Southern Motorway between Drury and Bombay]
- 3.□ While some of the Projects that are the subject of these NORs could be built and operated independently of the others, some are dependant on at least parts of others, and each of the Projects is intended and designed assuming that all of the other projects would also be implemented. Some of the Projects could also be constructed in stages with some sections implemented earlier than others.
- 3.□ A key issue for these NORs is the inter dependency of each of the Projects with each other and with other transport infrastructure projects in the area.

Adverse Effects

- 3.□ The Projects would provide substantial benefits but would also produce some adverse effects.
- 3.□ Some sections of some Projects are located along existing roads. In some cases the projects require additional land along one or both sides of those roads so that new or improved transport facilities can be provided. In some locations the design of those facilities is

□

expected remove existing development, alter property access arrangements, or change movements at intersections.

- 3.4 Some parts of the Projects will provide new sections of road that will significantly change the local environment, divide properties, affect existing land use, and change access to properties.
- 3.5 A key issue for these NORs is how the adverse effects generated by the design and operation of the Projects can be managed, particularly as many design decisions have yet to be made, and some of those design decisions may affect the management of effects.
- 3.6 Other adverse effects will be produced while the Projects are being constructed, and the construction of most Projects is expected to extend over many months and potentially be staged over several years. A key issue for these NORs is how the adverse effects generated by the Projects can be managed during construction.

Reasonably Necessary and Consideration of Alternatives.

- 3.7 Two key issues for the hearing panel are if the consideration of alternatives is adequate, and if the Projects are reasonably necessary.

4 Summary of the Projects

- 4.1 The report considers nine Notices of Requirement for eight arterial road projects in the Pukekohe, Paerata, Drury, Runciman, and Bombay areas of southern Auckland and northern Waikato. Auckland Transport (AT) is the Requiring Authority (RA) for six of the eight projects, and Waka Kotahi New Zealand Transport Agency (NZTA) is the RA for the remaining two projects. The assessments and other documentation have been prepared by Te Tupu Ngātahi Supporting Growth Alliance (SGA) a collaboration between AT and NZTA.
- 4.2 None of the Projects are expected to be implemented in the short to medium term. The designations sought by the NORs are intended to protect the routes from development that would prevent or hinder the implementation of the Projects.
- 4.3 The Projects are generally well described in the notified material and I summarise each project below. Some details of each project are described in more detail later in this report.
- 4.4 The projects include four arterials near the periphery of Pukekohe that together could act as a “ring road” around Pukekohe.

NOR 1: Drury West Arterial



- 4.1 The Drury West Arterial (DWA) is an AT project. It is a new arterial road connecting Karaka Road (State Highway 22, SH22) at Jesmond Road with Ngākōroa Station and over the North Island Main Trunk (NIMT) railway to connect with NOR 2 Drury-Pukekohe Link near Runciman Road.

NOR 2: Drury-Pukekohe Link




- 4.1 The Drury-Pukekohe Link (DPL) an NZTA project is a new state highway connecting from Great South Road near a proposed new Southern Motorway (State Highway 1, SH1) interchange in southern Drury, and running broadly parallel to the NIMT railway to meet the proposed ring of arterials around Pukekohe in the northern outskirts of the town. It also includes a connection between the DPL and Karaka Road (SH22).


NOR 3: Paerata Connections

- 4.7 This AT project [3]PC includes two new roads connecting the DPL with existing and future roads at Paerata Rise including Paerata Station. 


NOR 4: Pukekohe North-East Arterial

- 4.8 Together with NORs 5 to 7, the Pukekohe North-East Arterial [4]PNA is an AT project that will provide for a ring route around Pukekohe. The [4]PNA project is a new arterial road forming the north-eastern quadrant of the ring. 

NOR 5: Pukekohe South-East Arterial

- 4.9 The Pukekohe South-East Arterial [5]PSA is an AT project that uses new and existing road sections to form the south-eastern quadrant of the ring route. 


NOR 6: Pukekohe South-West Upgrade

- 4.10 The Pukekohe South-West Upgrade [6]PSWU is an AT project that involves adding active mode facilities along existing streets in south-western Pukekohe that could act as part of the ring route. 

NOR 7: Pukekohe North-West Arterial

- 4.11 The Pukekohe North-West Arterial [7]PNWA is an AT project that uses new and existing road sections to form the north-western quadrant of the Pukekohe ring route. 

NOR 8: Mill Road and Pukekohe East Road Upgrade

- 4.12 This NZTA project proposes changes including widening to Mill Road [Bombay] and Pukekohe East Road. Part of the Mill Road and Pukekohe East Rd Upgrade [8]MPU project is in Auckland Region and part is in Waikato Region, so this project involves two Notices, one to Auckland Council and one to Waikato District Council. 

5 Requiring Authorities' Transport Assessment

- 5.1 SGA has prepared the Assessment of Transport Effects [ATE] report for the Projects for AT and NZTA which has informed the Assessment of Environmental Effects [AEE].
- 5.2 The ATE and AEE provide a brief summary of the planning and project refinement process that led to the adoption of the proposed network and the Notices that are intended to protect the routes and enable the eventual implementation of the Projects. An Assessment of Alternatives [AOA] is appended to the AEE.
- 5.3 The AEE and ATE describe the general approach to the assessment of these Projects, which can be summarised as:
- a) considering the operational effects of all the Projects together in the environment when currently planned growth¹ is completed, nominally 2040, meaning around 2040 or beyond
 - b) deferring the detailed design and address individual property access arrangements to the Outline Plan of Works [OPW] stage and

¹ As per the Auckland Council Future Urban Land Supply Strategy (FULSS)

- c□ deferring the management of effects produced by construction to a range of management plans.
- 4 The AT□ is informed by a range of data sources including historical crash data, and software models of forecast transport environments at regional and local scales. The regional transport model is based on forecast land use patterns, with the version used for assessing the Proiects assuming the land use patterns contained in the FULSS are realised.
- The notified material e□plains that the designs provided are initial concept designs developed to determine the areas of land that need to be protected. The intention is that sufficient land will be protected to enable a Proiect to be implemented at some point in the future. The final form of each Proiect could be different to the concept designs included in the notified material.
- I generally agree with most of the A□□ and AT□ and the conclusions drawn, although those conclusions are subiect to a few caveats that I discuss later in this report.

6 Transport Environment

- As e□plained in the notified material, the Proiects are not e□pected to be implemented in the short or medium term, although it is possible that some parts of some Proiects may be implemented earlier if funding is provided. As a result, the receiving environment for the Proiects is e□pected to be significantly different to the current environment in some areas but could be very similar in other areas where growth is not planned.
- 2 While the designations sought by the NORs will be effective immediately, they are not e□pected to have any significant effect on how the transport network operates until construction work begins. Construction could occur in stages over a number of years depending on how funding is prioritised.
- 3 The e□isting and forecast future environment in the vicinity of each Proiect is well described in the notified material. The studies and material informing the background and development of the Proiects reflects the current growth planning at that time, as set out in FULSS, the DOSP and the PPSP.
- 4 Since those documents were prepared changes such as the Medium Density Residential Standard □MDRS□ the intensification re□uirements of the National Policy Statement on Urban Development □NPS□UD□ and the proposed Plan Change 7□ □PC7□ have occurred. Those changes have influenced the FDS.
- The FDS removed some future urban areas that were included in FULSS, but none of the removed areas are in the area relevant to these Proiects. The FDS also delayed the development of some areas including Paerata South.
- The FDS lists timing and infrastructure pre-re□uisites for identified future urban areas, including those summarised in Table □ below, where only transport infrastructure is listed, and the Proiects are shown in bold. All of the Proiects, apart from 3□PC are included as pre-re□uisites with some e□pected to be in place some time after 203□ or 2040.

Table 1: FDS Future Urban Areas, Timing and Transport Infrastructure Prerequisites²

Staging	Timing	Infrastructure Prerequisite
Drury		
Drury West Stage 1	Not before 2035+	SH22 Upgrade Drury Arterials Papakura-Pukekohe Rail Electrification Ngākōroa Station
Drury West Stage 2	Not before 2035+	SH22 Upgrade Drury Arterials Ngākōroa Station
Drury West Stage 3	Not before 2035+	SH22 Upgrade Drury Arterials Ngākōroa Station SH1 Drury South Interchange 1,2: Drury West and South Drury Connection ^a Great South Road Upgrade
Pukekohe and Paerata		
Paerata South	Not before 2035+ (previously 2030+)	SH22 – Paerata Station Connection 2: Paerata Arterial ^b Paerata Station
Pukekohe East	Not before 2035+	5: Pukekohe South East Arterial ^c 8: Mill Road Upgrade (Bombay Interchange and Harrisville Road) ^d Papakura-Pukekohe Rail Electrification
Pukekohe South West	Not before 2035+	6: Pukekohe South West Upgrade ^e Papakura-Pukekohe Rail Electrification
Paerata West	Not before 2040+	SH22 – Paerata Station Connection 2: Drury-Paerata Link ^f 2: Paerata Arterial ^g SH22 Safety Improvements Paerata Station
Pukekohe Northeast	Not before 2040+	4: Pukekohe North East Arterial ^h 2: Paerata Arterial ^g Papakura-Pukekohe Rail Electrification
Pukekohe Southeast	Not before 2040+	5: Pukekohe South East Arterial ^c Papakura-Pukekohe Rail Electrification
Pukekohe Northwest	Not before 2040+	7: Pukekohe North West Arterial ⁱ Papakura-Pukekohe Rail Electrification

Notes:

- a. Drury West is NOR1:DWA. South Drury Segment of NOR2:DPL
- b. Paerata Arterial Segment of NOR2:DPL
- c. NOR5:PSEA
- d. NOR8: MPEU and a separate project to upgrade Bombay Interchange
- e. NOR6: PSWU
- f. Drury-Paerata Segment of NOR2:DPL
- g. Paerata Arterial Segment of NOR2:DPL
- h. NOR4: PNEA
- i. NOR7: PNWA

- 7 The slight delay in Paerata South timing is not expected to change the need for any of the Projects, but the timeframes and dates in the notified material should be considered to be general indications.
- Some aspects of the existing and forecast environment are discussed further below.

² Extract from Auckland Future Development Strategy Appendix 6 (Auckland Council Planning Environment and Parks Committee Minutes 2 November 2023 Version)

7 Assessment of Alternatives

- 7.1 The RMA provides for a RA to designate “for a project or work; or in respect of any land ... where a restriction is **reasonably necessary** for the safe or efficient functioning or operation of such a project or work”³.
- 7.2 As the Hearing Panel will be well aware, it must consider the effects having particular regard to four areas, two of which are
- (b) *whether adequate consideration has been given to alternative sites, routes, or methods of undertaking the work if ...*
 - (c) *whether the work and designation are reasonably necessary for achieving the objectives of the requiring authority for which the designation is sought; and*
- 7.3 The notification material, and chiefly the AOA document, describe the process taken to consider a wide range of alternative means and methods of achieving the objectives. In general the process considered a broad range of alternative routes and forms and evaluated each against various criteria.
- 7.4 In my view most of the Projects, or at least projects very much like them, are reasonably necessary to provide for forecast growth in the sub-region at the macro scale. I am also of the view that alternatives sites, routes, and methods have been well considered at the macro scale. I would therefore agree that a new arterial route around the north-eastern periphery of Pukekohe, for example, is reasonably necessary when considered together with the other Projects, that a range of alternatives to such a link have been considered, and that the alignment is broadly in an appropriate location.
- 7.5 What may be less certain is the adequacy of consideration given to alternative methods of undertaking the work and how reasonably necessary every individual part of every piece of land to be restricted is at the micro scale.
- 7.6 The material presents initial concept design drawings, and as noted earlier the implemented project may differ from the concept design. My understanding is that detailed design matters such as determining the exact location of any particular element or choosing different methods of construction such as a batter slope or a retaining wall have not yet been made and are intended to be made at the OPW stage when detailed designs have been completed. For example, the final level of the Project at any point could change, so the need for and extents of features such as a batter slope or retaining wall have a degree of uncertainty.
- 7.7 That is somewhat understandable given the expected implementation timeframes and the resulting uncertainty about what the future environment may look like. As a result, in some locations there may be opportunities to consider an alternative method of undertaking the work in order to reduce effects, potentially including the area of land required. There may be locations and properties where consideration of alternative methods could result in refinement of the Project footprint now, and other locations where it may be premature to refine or restrict the range of methods at this time.
- 7.8 The proposed requirements for land also include land required for the construction, operation and maintenance of the Projects. When construction is complete it may be possible to reduce the area of land required. This is commonly done for other road infrastructure projects, and it is expected to occur for these Projects.
- 7.9 Some NORs I have been involved with have made a distinction between areas required permanently and areas required only for construction, but in each case the design had progressed to a more detailed stage and implementation was imminent. Given the route protection intention and the early concept level of design the absence of a distinction between the permanent and temporary occupation extents is understandable and, in my view, appropriate.

³ S168 (2) Resource Management Act 1991

- 7.00 Where access to properties is or may be affected by a Project I understand the design work and the AOA has not considered a range of options for how access to all properties may be managed. Access to properties is considered in more detail below.
- 7.01 There is no discussion in the notification material about other design decisions, such as considering the alternatives of an on-road cycle lane versus an off-road cycle path, or a shared path for both pedestrians and cyclists versus two separate paths. The concept designs prepared to support the notices either adopt the current standard of the relevant RA or defer the decision to the detailed design and OPW stage.
- 7.02 At this preliminary stage that may be an appropriate response as design standards change over time—however, there are some aspects of these design decisions that may be less suited to some environments.
- 7.03 For example, where cyclists are travelling close to the road boundary and intersect driveways the provision of appropriate visibility between cyclists and drivers of vehicles leaving properties is an important factor for safety. This is often addressed by restricting or prohibiting driveways across such paths, increasing the distance between the path and the boundary—to somewhere in the order of 1m—reducing the speed of cyclists, or imposing controls on boundary fencing or planting. Some of those measures could increase the designation footprint or affect property owners. None of the concept designs or assessments include these measures.
- 7.04 I have significant concerns around the safety of the proposed active mode paths where they cross driveways, and this is most significant where cycle or shared paths are provided in urban areas with a higher frequency of driveways, such as along 1PS1U.
- 7.05 In other cases where the volume of pedestrians and cyclists is likely to be lower, such as in the rural areas, the use of a single shared path for both cyclists and pedestrians may be acceptable and result in less land being required.
- 7.06 Ultimately, the provision of a sufficiently safe and effective transport environment, including cycling facilities, is the responsibility of the RAs, however the assessment of likely effects and the reasonable necessity for the extent of land required are squarely within the scope of this process. For those reasons I request the RAs provide additional information on these points at the hearing.

8 Operational Transport Effects and Management Methods

Scope of this Report

- 01 This report has been prepared on the basis that its primary function is to assist the reporting planner and the hearings panel to understand the likely transport-related effects of the projects, and to assist with their decision making with respect to the key matters of the assessment of alternatives, and if each project is reasonably necessary.
- 02 In considering the assessment of alternatives I note that the RA is not required to have undertaken an exhaustive assessment of every possible alternative and is not required to have selected the “best” alternative.
- 03 This report is not a design review or a safety audit and does not address the adequacy or suitability of the proposed designs, except where this is likely to impact on the effects or where relevant to submissions.
- 04 If, for example, the road near a roundabout is too steep or there are too many roundabouts within a short distance, those are not matters this report is properly able to consider, unless the assessment of alternatives, the assessment of effects, or the necessity of the project is significantly impacted.

- When considering the impact of the Notices, there are also a range of potential effects that could be generated without a designation. For example, a wire rope median barrier could be installed along an existing road to improve safety at the expense of additional journey length for properties that no longer have right turn movements available. This type of activity is being undertaken on parts of SH22, albeit with management of some adverse effects following consultation with affected parties.
- In a similar manner, each Road Controlling Authority (RCA) may undertake maintenance and construction work within the road reserve, and in some cases the effects arising from this already-enabled work may be similar to the effects generated during construction of some parts of the Projects. This report attempts to consider the operational and construction-related effects of the Projects bearing those already-enabled effects in mind.

All Projects

- 7 In general the methodology and techniques used for assessing the operational effects as presented in the notified material are considered to be appropriate and adequate however, there are some points to be aware of.

Purpose

- The Form □□ for each NOR sets out the purpose and objectives for each Project. The purpose and objectives are not repeated here but are important when considering the need for each project and the sites, routes, and methods for the work.

Design Standards

- 9 As explained in the AT□ the assessment of the Projects is aimed at route protection for longer-term projects and some aspects of the receiving environment and the design are not yet certain.
- 0 The ATE explains that as part of this approach the assessment uses use of “*generic cross-sections and design standards*”⁴ and focuses “*more on desired outcomes and footprints*”.⁵ Generic design standards invariably include desirable dimensions, or at least “desirable minimums” rather than absolute minimum values. In many cases a non-compliant design may still provide appropriate service.
- Given the uncertainties about how growth will occur it is considered generally reasonable that the Projects are based on generic designs in order to provide some ability to adapt the Projects to the growth environment at the time of implementation, and to site-specific environmental conditions. It is preferable that Projects are implemented to a reasonable standard, although there may be opportunities to reduce impacts and effects in some locations through judicious adjustment of design parameters. That would be a normal aspect of the detailed design phase, but some of those decisions could appropriately be made now.
- 2 For example, the notified material shows an indicative form of intersection control, such as Give Way, roundabout, or traffic signals. While the form shown in the concept designs is probably the most likely to be adopted, the various trade-offs between those choices may result in a different decision being made prior to construction. As detailed below the choice of intersection control in particular may have a significant impact on some effects.
- 3 Another example is the decision to provide separated or combined walking and cycling paths. That appears to be a decision that is easier to make now and one that could have a significant impact on the amount of land required in some areas.
- 4 The Hearing Panel may wish to consider how the stated “desired outcomes” relate to the “alternative methods” and “reasonably necessary” matters at a more detailed level when considering submissions.

⁴ ibid

⁵ Page 9, ATE

Management of Effects

- Given the longer timeframes and inherent uncertainties around what the receiving environment or the design will look like at the time of implementation, the material relies heavily on management plans to manage effects. In that situation the deferral of effects management to future management plans may be the most practicable option but it is essential that the conditions which govern the preparation and implementation of those plans have a relatively broad scope and are robust. I return to the conditions around management plans later.

Integration of Transport and Land Use

Overall Growth

- The AT□ explains that a key element of the assessment is the environment against which the effects are assessed. It acknowledges the relationship between the Projects and the growth they are intended to support, and that the Projects are “*unlikely to occur without such development*”⁶.
- 7 The assessment material evaluates the benefits of the Projects assuming that all development would occur with or without the Projects. In my view much of the development is unlikely to occur without the Projects, which has not been accounted for in the AT□ benefits analysis, although the interplay is acknowledged. This dependency of growth on the projects is reinforced by the FDS which makes the Projects prerequisites for growth in various areas.
- This interplay is not unexpected given the desire to integrate land use and transport is a common theme in growth strategies and plans and it may be difficult, and undesirable, to try and separate the two. It is now relatively common for plan changes to rezone land for development to connect the provision of infrastructure with various levels of development, and I expect future plan changes could place some restrictions on the scale of development until specific parts of some of the Projects are operational.
- 9 I do not consider it appropriate or necessary to assess the effects or effectiveness of the Projects against what could be a nearly infinite number of possible development scenarios, but it is useful to remember that the benefits attributed to the Projects may not all occur unless all of the planned growth also occurs.

Local Development

- 20 The Projects do not include the provision of planned collector roads as shown in the DOSP and PPSP. Collector and local roads are expected to be provided by developers as the land is developed, often in general accordance with a Precinct Plan which may show indicative locations for collector roads.

Assessment of Operational Effects

- 2□ The assessment of effects from the operation of the Projects has been informed by computer modelling. As noted in the AT□ the modelling has compared the effects of all growth occurring without any of the Projects in place against all growth occurring with all of the Projects in place.
- 22 The AT□ acknowledges that the Projects have “*been designed as part of an overall integrated system, but in general the projects can be delivered separately.*” From my examination of the projects I consider it is also possible, or even likely, that individual Projects may be delivered in stages.
- 23 As always, it is possible that some parts of some Projects, or indeed whole Projects, may not be delivered in parallel with the planned growth, or may not be delivered at all. That could occur for a variety of reasons including growth occurring in an unexpected manner.

⁶ ibid

- 24 In the event that some parts of one or more Projects are not implemented as currently envisaged it is possible that the full range of benefits attributed to the combined Projects may not be realised. It is also plausible that some parts of some Projects may not operate as efficiently without other parts of the network in place and that the benefits of the remaining projects may not be fully realised.
- 2□ It may not be necessary or appropriate to model each part of each Project separately, but the potential for the benefits to be less than expected in a partial implementation situation should be understood. Given the Projects have been considered as a whole, it is also possible that one Project, or one part of one Project is not □as□beneficial on a stand□alone basis.
- 2□ The transport models used to inform the assessment include using the regional MSM model which is based on land use forecasts which in turn are based on regional population forecasts produced by Statistics New Zealand. The models represent the planned land use pattern, such as those shown in the DOSP and PPSP. As land is not always zoned in accordance with those expectations there may be some differences between the forecasts and the actual land use pattern.
- 27 I understand the models used for the assessment were the most current available at the time, but do not reflect potential intensification of existing urban areas. Such intensification may assist in slowing down the demand for development of greenfield areas, so there may be some more localised differences.

Road Safety

- 2□ The assessment of the effects on road safety has considered the recent crash history in the area and how the design standards align with a harm□minimisation approach which focusses most heavily on reducing deaths and serious injuries □DSIs□from crashes.
- 29 The AT□ presents a summary of crashes on selected routes in the study area over the ten□ year period 20□2□2022. The AT□ notes that AT has recently reduced speed limits on many of the key routes studied with the intention of reducing DSIs and total crash numbers. In addition, the Covid□9 Health Orders and the residual effects on working and travel patterns are likely to have contributed to a reduction in total crashes during 202□and 2022.
- 30 Some of the routes in the area have previously been identified as having a high or medium crash risk using the historical KiwiRAP assessment. Some safety improvements have been undertaken on SH22 and more are proposed to occur within the medium□term.
- 3□ Due to the increase in travel associated with the forecast growth and the relatively poor standard of some parts of the road network, the current road network is stated in the AT□ to not be fit for purpose, despite planned improvements.
- 32 The Projects will provide a number of new high□standard roads that are expected to be an attractive choice for many □urneys in the area resulting in fewer vehicles travelling on the lower□standard roads, reducing the risk of crashes on those roads, as crash frequency is proportional to traffic volume.
- 33 There are a small number of railway level crossings in the area. The level crossings on the NIMT railway are all considered to be high□risk with that risk being exacerbated by increasing traffic volumes and increasing train movements. All of the level crossings on the NIMT are proposed to be removed or replaced by grade□separated crossings as part of other projects.
- 34 The level crossing of the Mission Bush Branch □MBB□railway on Heights Road on the north□ western periphery of Pukekohe is likely to remain given the relatively low traffic volume and train movements, and the proposed 7□PNWA Project is expected to reduce the future traffic volume on that road. Development in that area that has the potential to increase the volume or pattern of traffic using a level crossing may need to undertake an independent Level Crossing Safety Impact Assessment □LCSIA□to KiwiRail standards, and potentially upgrade the crossing.

- 3□ The AT□ states “*There are significant safety-related adverse effects expected if future growth progresses and the existing transport environment remains the same*”⁷
- 3□ If the Proēcts are not confirmed, or if their implementation is delayed, I would not eēpect the eēisting transport environment to remain the same. I eēpect the road controlling authorities □AT and NZTA□would address the increased crash risk by other means.

- 37 For eēample, the AT□ suggests□

“The upgrade is expected to result in significant positive effects on safety when compared to the existing and future receiving environment without the projects, and these consist of:

...

- *An improved speed environment by reducing speed limits to more appropriate urban speeds with enhanced place function and consequential reductions in the risk of DSI’s;*

...

- *Improved rail crossing facilities for all users in Drury, Paerata and Pukekohe by adding five grade-separated crossings over the NIMT which will reduce the risk for DSI’s, see Figure 5-1. No explicit recommendation for closure of existing rail crossings has been proposed as a part of the NoRs but it is assumed to be in place as per the TCDM, Part 9 level crossings; and”*

- 3□ I would eēpect that reduced speed limits would occur with or without the Proēcts as areas are urbanised. Other proēcts are planned that would result in the removal of rail level crossings in the area.
- 39 While I consider the safety benefits attributed to the Proēcts may have been slightly overstated, I consider the proposed Proēcts are likely to be the most effective means of reducing the crash risk, and note the Proēcts are eēpected to produce significant reductions in the rate of crashes on roads in the area.
- 40 Safety aspects of the proposed cycle facilities are discussed below.

Active Modes

- 4□ The AT□ provides a description of the eēisting active mode □walking and cycling□facilities in the area. As eēpected, most of the roads have no dedicated facilities where they are located in a rural environment.
- 42 Figure 3□□ of the AT□ shows maps of the eēisting walking network and deficiencies sourced from AT Future Connect (AT’s Network Plan). The “Walking Deficiency Indicator” map shows deficiencies in the eēisting walking network, and these may include a footpath that is narrower than the current standard width or paths along a busy road where there are few pedestrian crossing facilities. Many of the footpaths present in the network would have been constructed prior to Auckland Transport adopting the current standard □□m width, so would show on the map as being deficient.
- 43 There are few cycle facilities in the area, particularly in the rural areas. In general, cycling can be undertaken relatively safely on lower□speed lower□volume streets such as those found in the maōrity of the suburban residential areas, but on busier roads the higher speeds and higher volumes of both bicycles and other vehicles increases the desirability of providing some form of cycle facility such as a roadside path or an on□road lane.
- 44 The low population density in the rural areas would generally result in low and dispersed demand for walking and cycling, but as development occurs and the population density increases the demand for walking and cycling would increase.
- 4□ Some destinations in the area would be within cycling distance for many residents, but it is eēpected that perceived safety risks would deter many people from choosing to cycle unless suitable facilities are provided.

⁷ Pg 33, ATE.

- 4□ The AT□ shows□ three significant active mode facilities are planned in the area. These include proposed facilities along Karaka Rd □SH22□as that corridor is widened, a planned Regional Cycling Corridor beside the Southern Motorway □Drury to Bombay□supplementing the cycle path further north, and a Regional Active Mode Corridor □AMC□beside the NIMT railway including between Drury and Pukekohe. These facilities will improve the movement of people as the area around Drury is developed and better service longer□distance cycling □ourneys in the sub□region.
- 47 As land in the area is urbanised it is e□pected that footpaths would be constructed on both sides of every new or widened road, and that cycle facilities would be constructed on both sides of every new or widened collector or arterial road. In some locations additional facilities, such as paths beside streams or through reserves may also be added. As a result, as the area develops active mode connectivity within each new urban area is e□pected to be e□cellent.
- 4□ The AT□ suggests that the provision of active mode facilities within every one of the Pro□ects is essential, principally to enable access to “*social, educational and employment opportunities*” without needing to have access to a car⁹.
- 49 Active mode facilities along the Pro□ect corridors are part of the e□pected road form for all new or upgraded collector or arterial roads in urban areas. In rural areas the form of the facility would generally be considered in relation to the e□pected demand, which in turn relates to the location of destinations. Given the distance between many of the destinations in the area, walking and cycling □ourneys on the longer sections of the rural or semi□rural network are more likely to be recreational.
- 0 The concept design for each Pro□ect includes walking and cycling facilities on at least one side of the road. The form of the facilities is yet to be determined and is intended to be confirmed at the OPW stage once detailed design has been completed. As noted earlier this decision could impact the amount of land re□quired.

Cycle Path Safety Concerns

- Some of the Pro□ects propose the installation of shared or separated cycle paths between the property boundary and the edge of the general traffic carriageway. In the e□isting urban areas, particularly along the □PSWU route the paths are crossed by numerous property access driveways.
- 2 Moving cyclists from a shared lane or dedicated lane on an arterial road to an off□road location can result in significant improvements to cyclist safety as a result of increased distance between the cyclists and motor vehicles resulting in fewer collisions.
- 3 This may be offset by an increase in crash risk where a cycle path crosses multiple driveways. The risks are higher where□
 - a□ the cycle path is relatively close to the property boundary and sight lines between cyclists and drivers are constrained by boundary treatments such as fences and planting□
 - b□ the path is a bi□directional one□
 - c□ the speed of cyclists is higher□
 - d□ the speed of driveway vehicles is higher□
 - e□ there are more driveways.
- 4 New Zealand research showed that □4□ of cyclist crashes in urban areas occurred at driveways and notes□¹⁰

⁸ Figure 3-15, page 35, ATE

⁹ Section 3.2.3, ATE.

¹⁰ Pgs. 107, 115. National Cycle Facility Design Guidance Best Practice Review, Abley and Via Strada, July 2015.

“Risks at intersections and driveways are a major factor in terms of the relative safety of one directional vs bi-directional facilities.”

□□□ The □PSWU facility is proposed as a bi-directional path along one side of the road.

□□□ One well-respected New Zealand practitioner has stated^{□□}

Well-designed cycle paths, can be safe and pleasant for cycling.

Having said that, many existing cycle paths in New Zealand fall far short of the required design “best practice”, and potentially put cyclists at risk. Simply put, a good cycle path has no driveways crossing it unless there is ample unimpeded visibility between driveway users and the path. In practice, this means that a cycle path must be separated from the boundary (from where driveways emerge) by at least 7 m. Where a cycle path is close to the boundary, cyclists are unable to stop in time to avoid hitting (or being hit by) a car emerging from a driveway.

□□7 The national NZTA Cycle Network Guidance □CNG□states^{□2}

As for two-way separated cycleways, shared paths adjacent to roads involve hazards for cyclists at driveways, particularly those travelling in the direction opposite to that of traffic on the adjacent lane.

□□□ NZTA also notes□

While separated cycleways feel safer and have been proven to be safer between intersections and driveways, they are generally less safe at intersections and driveways, which are the locations where the risk is highest overall. It is crucial that this risk is mitigated through good design.

Cycling in the contraflow direction is more hazardous for separated cycleways at driveways, especially for cycleways located close to the roadway, where drivers base their expectations for cyclists’ direction of travel on the adjacent traffic lane.¹³

□□9 The CNG also refers to the Australasian guidelines. The Australasian design guidance recommends that one-way paths have limited driveway crossings □preferably fewer than □ per □00m□ and^{□4}

In urban arterial road related areas it is recommended that where practicable paths are to be located with adequate clearance from both road traffic and the property line so that adequate sight distance is achieved for vehicles and pedestrians leaving driveways and gateways.

□□0 The Christchurch Cycle Design Guideline states^{□□}

Preferred location for this facility is when the path only has to cross a limited number of intersections and driveways. Consideration is to be given to the buffer distance from the driveway, intervisibility, between pathway users and drivers entering/exiting, fence and boundary vegetation heights, the layout and locations of buildings, including auxiliary buildings such as garages, high volume driveways and density of land use.

□□□ The Auckland Transport Design Manual □TDM□sets out some re-quirements□

a□ The TDM considers it imperative that driveway entrances are minimised, that driveways show priority for the paths, and that speeds are reduced.

¹¹ The Case Against Cycle Paths, Macbeth, AG,

¹² <https://www.nzta.govt.nz/walking-cycling-and-public-transport/cycling/cycling-standards-and-guidance/cycling-network-guidance/cycle-network-and-route-planning-guide/principles/cycle-route-components-between-intersections/#shared-paths>

¹³ Technical Note TN002: Updated guidance on separated cycleways at side roads and driveways, NZTA, 2020.

¹⁴ Page 36, Guide to Road Design Part 6A: Paths for Walking and Cycling, Austroads, 2017.

¹⁵ Pg 2, Christchurch Cycle Design Guidelines, Christchurch City Council, 2016.

- b) *“Visibility splays must be provided suitable for the operating speed of the cycleway, from a vehicle stopped clear of the cycle way”*
- c) *“Vehicle crossings to multiple residential properties may require a speed control measure such as a ramp up to the vehicle crossing at the property boundary in addition to the visibility splay.”*
- d) *“Where cycle facilities cross commercial driveways “green dashed” markings should be used to raise awareness of people on bikes.”*

□□2 In greenfield development areas Precinct Provisions are often included at the request of Auckland Transport and these can include the provision of cycle paths on all new collector or arterial roads, with no property access allowed across a path. As an example, the following standard applies in the Warkworth North Precinct

1553.6.4. Standards for vehicle access to Western Link Road and roads with separated cycleways or shared paths

Purpose:

- To ensure the safety of cyclists and pedestrians and facilitate public transport.

(1) Sites that front onto the Western Link Road or roads with separated cycleways or 3m shared path (pedestrian/ cycle) must not have direct vehicle access to the road and must be provided with access from rear lanes (access lots) or side roads at the time of subdivision.

□□3 To summarise

- a) I have concerns about the safety of cyclists using the proposed paths where there are numerous driveways, and those concerns are exacerbated for bi-directional and shared paths
- b) The safety issues may require mitigation measures to be taken, for example speed bumps on driveways, that have not been conveyed to potential submitters
- c) The safety issues may require an alternate design, such as a separated/protected cycle facility (similar to that provided on Nelson Street in Auckland’s CBD) where cyclists are more conspicuous.

□□4 I recommend Auckland Transport provide more evidence on this matter for the hearing.

Public Transport

□□□ The primary public transport services in the area are the Rapid Transit Network (RTN) rail services along the NIMT railway with stations at Pukekohe, Paerata and Ngākōroa. A small number of connector and local bus services are intended to support and supplement the RTN services by connecting local neighbourhoods to the rail stations and to each other.

□□□ The Projects are expected to improve the speed and reliability of some of the bus routes in the area by reducing traffic congestion, and in some cases by providing a new or improved route. No bus lanes are proposed for any of the Projects except on the DWA between Karaka Road (SH22) and Burt Road near Drury West station.

Freight

□□7 A significant volume of freight is moved through the project area, and a substantial proportion of that volume is agricultural produce being moved from producer to consumer. Several of the roads in the project area are classified as part of the strategic and supporting freight networks

□□□ The forecast growth would, in the absence of the Projects, result in significant additional traffic congestion, incurring many economic costs, including costs relating to the movement of

freight. By reducing expected traffic congestion in the area the Projects are expected to reduce delays and provide for more efficient and effective movement of freight.

General Traffic

- 9 As noted above, the forecast growth is expected to result in a significant increase in the demand for travel. While the Projects and other planned changes will improve the travel options available to people moving through the area, the majority of travel is expected to use private vehicles, as that will remain the most attractive and efficient option for many journeys.
- 70 The Projects will provide new and widened sections of road, increasing the overall capacity of the network, and enabling more efficient and economic movement of people and goods, including in private vehicles. While levels of traffic congestion would be less than in the absence of the Projects the congestion may not be less than what occurs now, at least during peak times.

Travel and Emissions

- 71 Planning decisions need to have regard to Climate Plans and the Emission Reduction Plans that may be prepared to support them.
- 72 Auckland's Transport Emissions Reduction Plan (TERP) has a goal of reducing travel in order to reduce emissions. The TERP provides vehicle kilometres travelled (VKT) as a measure of travel and an input into the calculation of vehicle emissions. VKT is problematic to measure.
- 73 VKT for assessments such as this is provided as an output of software transport models such as the regional MSM model or in this case the district-level SATURN model. The VKT estimates output by the models are for private vehicles (cars and trucks) and do not include travel made by public transport vehicles. As stated in the AT the models predict that the Projects would reduce private vehicle travel by 1.4 million vehicle kilometres per year. As the models use the same population projections and land use patterns this reduction in VKT would result from the new roads providing shorter journey distances and/or more people using public transport.
- 74 By making several assumptions around the average occupancy of vehicles, vehicle fuel efficiency, average travel speed, and congestion conditions the quantity of CO₂ emissions can be estimated from the VKT estimate. In this case the Projects are estimated to result in an annual reduction in CO₂ emissions of 2,700 t. The percentage change in VKT and emissions is not given.

Property Access

- 75 Most of the Projects will, or have the potential to, have significant impacts on property access arrangements.
- 76 As the 2DPL and AMP-U Projects are NZTA projects I expect that these roads could become State Highways and/or Limited Access Roads (LAR) but those processes would be independent of these NORs. Properties on a LAR can only be accessed through crossing points approved by NZTA under the Government Roadway Powers Act 1999. SH22 is a LAR.
- 77 In addition to the LAR powers administered by NZTA, the designation of land requires the approval of the RA to do some things within the designated land including subdividing it or changing the land use activities, so both NZTA and AT would have the ability to control property access. The Auckland Unitary Plan (AUP) and the Waikato District Plan (both Operative and Proposed) also provide some control on property access arrangements.
- 78 NZTA or AT can install median barriers, median islands, or side barriers on any road following consultation with affected parties. Medians may prevent right turns in and out of properties and some side roads, and due to the inconvenience caused these treatments are generally only implemented on existing roads in order to address a significant safety issue. NZTA is currently working on installing flexible wire rope median and side barriers to improve safety on some sections of SH22.

- 79 It is common practice for new or upgraded higher-order arterial roads to have limited or no property access, particularly for right turns. The absence of property access points, and right turns in particular, is known to make arterial roads operate more efficiently. Safety can be significantly improved, particularly where cycle paths are provided.
- 80 The AT notes that the requirement for turning restrictions will be determined as part of the OPW process. I address this and other property access considerations for each Project below.

Existing Property Access

- 81 The AT notes *emphasis added*

*For existing properties, our design philosophy for the Projects has been to **retain access wherever feasible.***

...
*In situations where a project impacts access (such as the need for realignment or regrading), these **specifics will be confirmed during the detailed design phase**, in coordination with the landowner, as part of property discussions under the Public Works Act*

...
*Due to the complexity of evaluating access arrangements changing over time, it's not currently possible to confirm a precise treatment for all individual accesses, particularly in areas that is transitioning from rural to urban. These arrangements may undergo changes before the projects are carried out. Thus, the most suitable time to confirm these details is during the detailed design stage, prior to the onset of construction. It should be emphasised that the requirement for turning restrictions will be determined as part of the Outline Plan, at this stage the focus is on route protection. The **draft conditions** include a condition relating to existing property accesses, which **will require the Outline Plan to demonstrate how safe alternative access will be provided** to any property where vehicle accesses that exist at the time of the Outline Plan lodgement will be affected.*

*An assessment of property access has been undertaken to inform the designation boundary and concept design and to assess potential effects. However, as the area continues to develop, particularly in the FUZ areas, addressing access during future detailed design stages is recommended. **In certain scenarios, restrictions on right-turn movements may be necessary for safety reasons.** The following assessment takes into account journey times affected by right-turn restrictions and suggests necessary mitigation measures.¹⁶*

- 82 All property must have legal access. I would therefore expect that if a suitable access could not be provided for a property for some reason, that property may need to be acquired by the RA.
- 83 Given the potential impact of changes to property access arrangements I consider it is important that the conditions for the designations address this matter comprehensively.
- 84 The AT has considered the number of properties that are likely to have access arrangements changed, and these changes are primarily the removal of right-turn movements due to the introduction of a median island or median barrier.
- 85 The AT has estimated the longest additional journey time imposed by this change. In almost all cases the assessment of this additional journey length is based on the presence of proposed roundabouts nearby as roundabouts allow for safe U-turn movements to be undertaken. The AT also suggests that in many cases the decision on the form of intersection control (give way, roundabout, or traffic signals) will be made during the detailed design and OPW stage.
- 86 Should an intersection currently proposed to have a roundabout have a different form of control, that is likely to exacerbate the adverse effects generated by the removal of right turn movements. Those could include adverse effects on efficiency by requiring longer detours or additional delay at an intersection. Longer vehicles in particular may be unable to make a U-turn movement except at a roundabout. The effects could also include adverse effects on

¹⁶ section 5.1.5, ATE.

safety as U-turn movements have a relatively high risk of collision when not made at a roundabout.

- 7 With that caveat, I consider the AT□ assessment of effects on e□isting property access to be otherwise reasonable and ade□uate.

New Property Access

- Reducing or eliminating property access from arterial roads is easier to achieve on new roads in greenfield development situations as the local street network can be designed to provide access to each property, with collector roads connecting the local street network to the arterials in a few discrete locations. This accords with best practice, particularly for higher□ volume higher□speed arterial roads.

- 9 The AT□ recommends an approach consistent with best practice□

For new property accesses, direct property access is not advised to better align corridors with its future arterial access requirements¹⁷.

- 0 The concept design does not provide collector road connection points as the design of the collector roads is sub□ect to further investigation and may be in a different location to the indicative locations shown in the structure plans. I e□pect the location of such intersections can be determined through liaison between the RA and developers at the time of detailed design of the Pro□ects, or once the pro□ects are constructed.

Parking

On-Street Parking

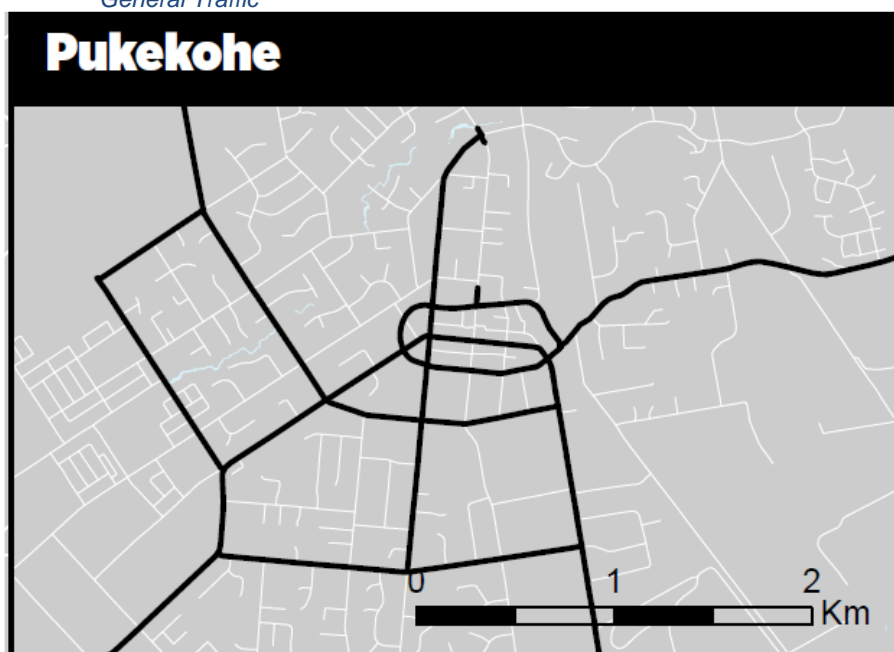
- 9□ The e□isting sections of road in the rural areas generally have no parking restrictions, although these roads have relatively narrow shoulders with little opportunity for parking. As a result of this and the low development density little on□street parking occurs in these areas.
- 92 The e□isting sections of road in the urban areas typically have relatively moderate to high demand for on□street parking.
- 93 I would e□pect that the higher□speed higher□volume sections of Pro□ect roads would have little if any demand for parking as a result of their being no direct property access in urban areas. I would also e□pect that parking restrictions could be imposed to prohibit parking on these road sections if necessary.
- 94 AT and Council have developed a Parking Strategy entitled “*Room to Move*”□□ which e□plains that general vehicle parking is given the lowest priority for allocation of kerbside space, and that on the Strategic Transport Network movement will be prioritised over parking. The strategy also says “*Where delivery of projects on AT’s Strategic Transport Network requires the repurposing of road space dedicated to parking, AT’s policy is to repurpose that space to the more beneficial use - unless there are exceptional circumstances*”¹⁹
- 9□ In this area the Strategic Network includes Karaka Road and Paerata Road □SH22□ □ast Street, Pukekohe □ast Road, Mill Road, Manukau Road and Buckland Road, and the roads shown in Figure □. I e□pect that each of the Pro□ects would become part of the Strategic Network and are therefore unlikely to have any on□street parking.
- 9□ I address any pro□ect□specific on□street parking matters below.
- 97 Regardless of the longer□term operational availability of on□street parking I e□pect that parking may need to be removed or restricted during the construction period□□ and that would be managed through the proposed management plans.

¹⁷ ibid

¹⁸ Room to Move: *Tāmaki Makaurau Auckland’s Parking Strategy*, Auckland Transport, May 2023

¹⁹ Page 41, Room to Move.

Figure 1: Strategic Transport Network – Pukekohe for Active Modes, Public Transport, Freight and General Traffic²⁰



Parking on Affected Properties

- 9□ Some properties proposed to be designated have parking or loading areas located in the affected areas, and the ultimate removal of the designated land may also result in parking or loading areas outside the designation being affected by changed access or manoeuvring geometry.
- 99 The impact of this change has not been assessed in the NOR documentation. I expect that most of the rural properties would be able to relocate any parking relatively easily. Urban properties that have higher development density may not be able to relocate or replace the parking or loading spaces lost as a result of the Projects. I address this further below.

Management of Effects

- 00 Given the uncertainties due to the current level of design and the long implementation timeframes it is not possible to be certain about the degree of adverse effects.
- 0□ For access to properties the RAs propose a condition requiring the OPW to demonstrate how safe access will be provided for each existing access that is altered. I recommend that the condition be amended to require that access is also demonstrated to be efficient and effective bearing in mind the vehicles that need to access the site.
- 02 It is common for construction effects for larger projects to be managed through one or more management plans, and that is the process proposed for these projects. The content of the construction management plan conditions is addressed later.

NOR 1: Drury West Arterial

Design and Changes to Network

- 03 This link is intended to be an urban arterial road with a 100km/h speed limit and walking and cycling facilities on both sides of the road. The stated purpose of this link is to, together with the future Southern Motorway Drury South Interchange and NOR 2 (DPL), to relieve the load on the existing Drury Interchange and provide for growth in Drury West. It also provides access to Ngākōroa Station. The concept design includes a median with the form flush or raised to be determined later.

²⁰ Extract from Map 2, Room to Move.



Northern End

- 04 The north end of the Project is the intersection of Karaka Road (SH22) and Jesmond Road, and the DWA will result in this T-intersection becoming a crossroads. This intersection lies within three existing designations – NZTA designation 70 for widening of SH22, a KiwiRail designation for provision of a transport interchange and access adjacent to Ngākōroa Station (currently awaiting confirmation on appeal) and AT designation 40 for the provision of widening of Jesmond Road. NOR would add a fourth overlapping designation.
- 05 Through these other designation processes it has been determined this intersection would be controlled by traffic signals. The northern end of the project is proposed to be constructed as part of the SH22 widening project and/or station access project.
- 06 Some land along SH22 and Jesmond Road has “live” zoning for development with the remainder of the land zoned Future Urban. I expect the land on either side of SH22 may be rezoned for development in the medium term.

Station Access – Burt Road

- 07 South of the station access the four-lane road would pass over the NIMT railway via a new overbridge and intersect with Burt Road. The four-lane section between SH22 and Burt Road is proposed to have one dedicated bus lane in each direction and one general traffic lane in each direction.
- 08 The intersection with Burt Road is expected to be controlled by a new roundabout, although the form of intersection control is subject to review. The form of intersection may also change as the surrounding land is developed and the number of pedestrian and cyclist movements increases. The land south of the NIMT railway is expected to be developed in the medium to long term.

South of Burt Road

- 09 South of Burt Road the two-lane DWA cuts through rural properties to terminate at the 2-DPL project. That crossroads intersection is expected to be controlled by a new roundabout. The intersection lies over part of the Runciman Road reserve and it is proposed the northern part of Runciman Road be diverted to a T-intersection on the DWA a short distance north of the 2-DPL intersection.
- 10 Without the diversion the DWA-2-DPL Runciman intersection would have five approaches. An intersection with five approaches is difficult to manage efficiently with traffic signals, and a roundabout with five approaches would need to be significantly larger in order to provide geometry with sufficient safety. The proposed form appears to be a reasonable method for implementing the projects.
- 11 The Project will result in a small increase in travel distance for journeys along Runciman Road, which would be represented in models and therefore in the overall VKT. There is no separate assessment of this additional travel distance in the material, but I expect in future that travel patterns would change and that it is quite likely that journeys along this part of Runciman Road might well occur along the DWA or along the eastern part of the 2-DPL in any case. On that basis, and given the short additional distance, I consider the impact of this change to be relatively minor.

Interdependencies and Staging

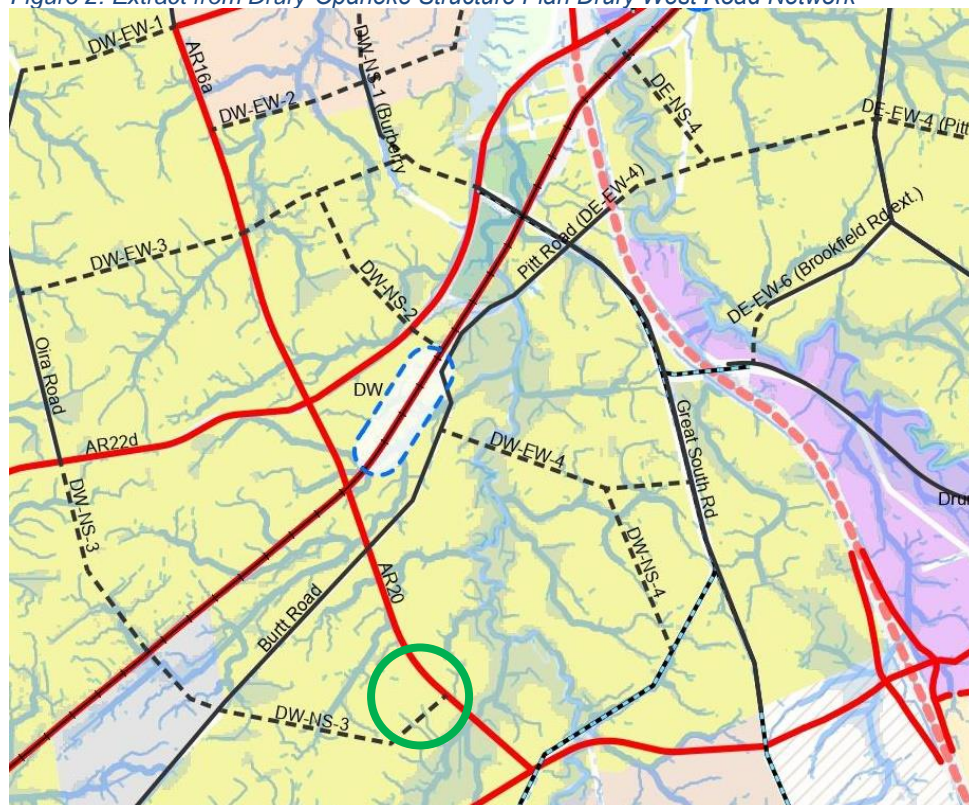
- 12 The northern end of the project is expected to be constructed in the short term in order to provide vehicle access to Ngākōroa Station. As noted in the AT the remainder of the project could be implemented as a stand-alone project, although there are likely to be few benefits to constructing the remainder in the short to medium term. Constructing the section north of Burt Road would have some benefits for accessing public transport services once the land south of the railway is rezoned. Constructing the southern portion would appear to have few benefits in the absence of the Drury South interchange and the eastern end of the 2-DPL.

- 3 The FDS makes provision of the “Drury West and South Drury Connection” a prerequisite for development of the Drury Stage 3 area which is expected to have timing of “Not before 2035”.

Property Access

- 4 The section north of the NIMT railway cuts through a few existing properties, with future access arrangements already affected by the Ngākōroa Station access project. The section between the NIMT railway and Burt Road appears to have no impact on access to properties other than dividing a rural property in two.
- The section between Burt Road and Runciman Road is also a new section of road so no properties are currently accessed from it, although the alignment does cut through some properties and may displace existing access arrangements from Burt Road or Runciman Road.
- The AT□ anticipates that up to three properties will have access restricted to left-in left-out movements due to the introduction of a median. The impact of the diversions required by the removal of right turn movements has been assessed in the AT□ by assuming nearby roundabouts would safely provide for U-turn movements and that travel times would be increased by up to two minutes. If one or both intersections are controlled by traffic signals the additional travel time could be longer, but in the context of the probable existing journey times and the small number of properties affected I consider this impact to be reasonably minor, particularly in the future when additional local roads may provide more routing options.
- 7 The AT□ recommends against the □DWA providing direct access to properties. I expect all new development would be accessed from a collector road, and that only collector roads would connect with the □DWA.
- The DOSP shows the proposed □DWA as “AR20” and shows an indicative collector road “SWINS3” connecting with the DWA about halfway between Burt Road and the DPL (shown as a green circle in Figure 2□

Figure 2: Extract from Drury-Opāheke Structure Plan Drury West Road Network



- 9 The concept design for the □DWA does not show this collector road as the exact location is currently unknown. The final form and location of any collector roads will be determined through future rezoning processes (either a Plan Change or a revision of the Unitary Plan□

There appears to be sufficient ability to provide a new collector road intersection in this section of the DWA.

Parking

- 20 There is currently no parking on this route, and no on-street parking is expected to be provided.

Management of Effects

- 21 Effects are proposed to be managed by management plans, and the requirements for these are addressed later in this report.

NOR 2: Drury-Pukekohe Link

Overview



- 22 The Drury to Pukekohe Link (DPL) is the most significant of the eight projects, both in terms of the length of the route (10.1 km) and in terms of the impact on changing travel patterns in the area. The ATE describes this Project as “a new inter-regional strategic corridor connecting Drury, Paerata and Pukekohe.”²¹
- 23 The link will provide an arterial route between Drury and Pukekohe on the south-eastern side of the NIMT railway, complementing Karaka Road and Paerata Road (SH22) on the north western side. It also provides a third arterial road connection to Pukekohe.
- 24 In earlier documents, such as the DOSP, PPSP and the Integrated Transport Assessment (ITA) that informed them, this link was referred to as the “Pukekohe Expressway”. In those documents the expressway was expected to be delivered some time after 2041, was predicted to alleviate demand on SH22, and was predicted “to operate near capacity for significant sections across all parts of the day when introduced.”²² The expressway and the proposed Southern Motorway Drury South interchange were described as “needed to support the future place function of SH22”²³, which means the expressway was intended to reduce traffic volumes on SH22 so that SH22 could be urbanised as land on either side was developed.
- 25 The AOA document provides some background on the evolution of this corridor and others with respect to alignment and form. The Draft Strategic South Detailed Business Case (DBC) recommended a four-lane high-speed state highway²⁴.
- 26 A range of options were then examined, and the AOA suggests that changes in government policy with an increased focus on climate change had an impact on the outcome. From the AOA it appears that a four-lane road was thought to be less desirable based on, among other things, a theory that additional lanes might induce extra travel which would result in less travel by public transport and produce additional emissions, and this was one of many items included in a multi-criteria analysis. The evaluation is summarised in Table 4.7 of the AOA.

Design, Changes to Network, and Interdependencies

- 27 The Project, now referred to as the Drury-Pukekohe Link, is proposed to provide a two-lane state highway with a median, having a 100 km/h speed limit in urban sections and 130 km/h in rural sections, although speed limits are subject to change as the design and surround development progress.
- 28 The AT material divides the route into four segments.

²¹ Section 5.1.5.2, pg 69, ATE.

²² Pg xv, Drury-Opāheke and Pukekohe-Paerata Structure Plan ITA, April 2019.

²³ Pg 42, DO and PP SP ITA.

²⁴ Pg 56, AOA

South Drury Connection Segment

- 29 The South Drury Connection segment runs from Gt South Road where the Southern Motorway Drury South interchange is proposed to connect, westward to near Burt Road. Burt Road is proposed to be realigned so that it meets the 2nd DPL at right angles, and the intersection is expected to be controlled by a roundabout. The realignment of Burt Road is considered necessary to avoid Burt Road meeting the 2nd DPL at an acute angle which would produce poor operational outcomes for either traffic signals or a roundabout.
- 30 This section is expected to have an urban environment on the northern side and a rural environment on the southern side. Walking and cycling facilities are proposed on the northern side. The speed limit is expected to be 40km/h or 60km/h and the road is expected to have a median with the form to be determined later.
- 31 The South Drury Connection is listed in the FDS as a prerequisite for Drury West Stage 3 “Not before 2030”

SH22 Connection Segment

- 32 About 100m west of Burt Road the Drury-Paerata Link segment intersects with the southern end of the SH22 Connection segment. The SH22 Connection segment passes over the NIMT railway to intersect with the northern part of Sim Rd before following the northern end of Sim Rd to SH22²⁵. All of the intersections along these segments are expected to be controlled by roundabouts.
- 33 This segment is expected to be a rural arterial road with an 40km/h speed limit. Walking and cycling facilities are proposed on one side.
- 34 The ATE notes the South Drury and SH22 Connection segments could be implemented separately from the remainder of the DPL as land in Drury West is developed to assist in reducing the volume of traffic using Karaka Road to SH22.
- 35 The FDS does not explicitly include this segment as a prerequisite.

Drury-Paerata Segment

- 36 From the SH22 connection intersection the Drury-Paerata segment of the DPL turns to the southwest and runs broadly parallel to the NIMT railway at a distance of 100-200m for about 2km before meeting the southern end of the two 3rd PC roads at T-junctions that are expected to be controlled by roundabouts. The section between the two roundabouts replaces part of Sim Road to the south.
- 37 This section is expected to be a rural arterial with a speed limit of 40km/h or 60km/h with walking and cycling facilities on one side.
- 38 The ATE suggests this segment would be staged last “to provide optimum mode shift outcomes”²⁶. I interpret that to mean that completing the 2nd DPL earlier is thought to encourage people to drive instead of taking the train.
- 39 The FDS lists the “Drury-Paerata Link” as a prerequisite for development of Paerata West “Not before 2040+.”

Paerata Arterial Segment

- 40 From Paerata the Paerata Arterial segment runs to the south along the remaining length of Sim Rd to the south and the section of Tuhimata Road between Sim Road and Cape Hill Road. It then replaces a short section of Cape Hill Road to terminate at 4th PN/A.

²⁵ Sim Road has a formed northern section, an unformed central section, and a formed southern section.

²⁶ Pg 46, ATE

- 4□ This segment will have an urban environment on one side and a rural environment on the other, a □0km/h speed limit. Walking and cycling facilities may be provided on one or both sides.
- 42 The AT□ suggests this southern segment would be best provided in conjunction with 3PC and 4PNA to connect this segment to the remainder of the network at either end.
- 43 South of the 3PC the route replaces parts of Sim Road, Tuhimata Road and Cape Hill Road, and therefore is expected to have a significant impact on access in the area. The impact on properties is addressed below, but the Project also has an impact on local road connections.
- 44 By passing along a short □200m□length of Tuhimata Road the Project essentially divides Tuhimata Road into two parts. The intersection between the 2DPL and the western part of Tuhimata Road is expected to be controlled by a roundabout where all movements are provided for.
- 4□ The intersection with the eastern part of Tuhimata Road is currently shown on the concept designs as having a median island installed across the intersection, removing the ability to turn right here. Traffic wishing to turn right out of Tuhimata Road would need to turn left and U-turn around the proposed roundabout at Cape Hill Road, a detour about 700m in length. Traffic currently turning right from Cape Hill Rd into Tuhimata Rd would need to U-turn around the proposed roundabout to the north, a detour about 400m long. I expect some of the traffic currently making those turns may reroute along the new roads, although the demand for turning right out of the eastern part of Tuhimata Road may increase as a result of the 2DPL being more attractive than using Burt Road or Runciman Road. The impact of these detours is not explicitly assessed in the AT□ although I expect these movements are represented in the model and accounted for in the VKT estimate. I invite the RA to clarify this.
- 4□ The FDS lists the “Paerata Arterial” as a prerequisite for development of Paerata South “Not before 2035+), Paerata West “Not before 2040+” and Pukekohe Northeast “Not before 2040+”.

Active Modes

- 47 As noted earlier 2DPL generally runs parallel to the NIMT railway, and in some places these corridors are less than □00m apart. The regional Active Mode Corridor □AMC□is proposed to be constructed along one side of the NIMT railway to provide an active mode connection between Pukekohe, Paerata, and Drury with regular connections to the remainder of the network at various points along the route. Active mode facilities are also expected to be provided along Paerata Road Karaka Road □SH22□as the area is urbanised, which also runs broadly parallel to the NIMT railway on the opposite side to 2DPL.
- 4□ 2DPL is proposed to have walking and cycling facilities along one side to provide an active mode connection between Pukekohe, Paerata, and Drury with regular connections to the remainder of the network at various points along the route. This represents a duplication of facilities and raises a question about the additional width of the 2DPL corridor being reasonably necessary.

Property Access

- 49 It is expected that direct property access would not be available along this route. Most segments of this route are new sections of road with no existing property access. The AT□ expects that up to □0 properties may have access restricted to left-in left-out movements, requiring detours for the previous right-turn movements. The AT□ assesses the impact of the detours as being less than three minutes.

South Drury Connection Segment

- 0 This section is predominantly a new section of road although access to some properties is expected to be affected, particularly where the route intersects with existing roads such as Gt South Rd, Runciman Road and Burt Road.

- .□□□ Any properties with access between Gt South Road and Runciman Road would be able to use the roundabout at Runciman Road for one direction, but as the Gt South Road intersection is expected to be controlled by traffic signals a detour in the opposite direction would need to include other roads in the area.
- .□□2 If there are any properties with access at the western end of this segment the roundabouts at the SH22 connection and Burt Road are about □00m apart.

SH22 Connection Segment

- .□□3 Properties in the northern part of this link where the route uses the existing Sim Road alignment would need to use the roundabouts at SH22 and at Sim Road, which are □00m apart to overcome the removal of right turns resulting in a detour up to □.□km long, although shorter routes may be available by making use of SH22 and/or Sim Road through Paerata Rise when the latter connection becomes available.
- .□□4 For properties in the southern part of the link the two roundabouts are about □km apart resulting in detours up to 2km long, but as this is a new section of road few if any properties are expected to be affected.

Drury-Paerata Segment

- .□□□ Properties with access between the SH22 Connection Segment roundabout and the 3ꞑPC roundabout would need to use those roundabouts, which are 2.□km apart, to replace the former right-turn movements, resulting in detours up to □km long for some directions of travel.
- .□□□ If any properties have access to the 2ꞑDPL between the two 3ꞑPC roundabouts, they would be able to use the two roundabouts, which are about □00m apart to overcome the removal of right turn movements.

Paerata Arterial Segment

- .□□7 Several properties at the southern end of Sim Road will need to use the Tuhimata Road roundabout and the southern 3ꞑPC roundabout which are □.2km apart so the detours for those properties would be more significant at around 2.4km. Properties between the roundabouts on Cape Hill Road and Tuhimata Road will be able to use those roundabouts which are about □00m apart, resulting in detour lengths of up to □.2km. Depending on the length of the overall journey the additional detour length could represent a minimal to moderate increase in the journey length.

NOR 3: Paerata Connections

Design and Changes to Network



- .□□□ This Project provides two new road connections between 2ꞑDPL and Paerata Rise. The roads are expected to have an urban form with a □0km/h speed limit and active mode facilities on both sides.
- .□□9 The northern road replaces the connection between the northern and southern parts of Sim Road lost when the former Sim Road bridge crossing of the NIMT railway was removed. The southern road provides a new road connection between 2ꞑDPL and Paerata Station and the road network surrounding it. Both new roads are proposed to have two traffic lanes, active mode facilities on both sides and a □0km/h speed limit.

Interdependencies and Staging

- .□□0 The AT□ suggests this Project could proceed on a stand-alone basis, but as these roads would not connect to anything in the absence of the 2ꞑDPL project, it appears the two connections are entirely dependant on at least part of the 2ꞑDPL project being constructed. Alternately, the 2ꞑDPL project appears to be largely independent of these two connections.

- .□□□ This Project is not listed as an infrastructure prerequisite for any growth areas, presumably as they are intended to service land that is live zoned.

Property Access

- .□□2 The northern Sim Road connection lies adjacent and over the existing Sim Road alignment and interacts with a few properties. The AT□ notes that only one or two properties are affected and it considers realigning existing accesses to Sim Road to be viable. It is expected that medians would prevent right turn movements, and the AT□ assesses the additional travel time at less than one minute.
- .□□3 Properties accessed from Sim Road could make use of the roundabout proposed for the Sim Road □2□DPL intersection for one direction of travel, but for the other direction of travel those vehicles would need to either make a U-turn somewhere within the Paerata Rise development or take an entirely different route. Given these properties are currently accessed from the end of Sim Road, which is relatively remote, the opportunity to travel through Paerata Rise could result in a reduction in travel time to many destinations.

NOR 4: Pukekohe North-East Arterial

Design and Changes to Network



- .□□4 This two-lane corridor forms the north-eastern quadrant of the “ring road” around Pukekohe. The stated purpose is to provide for development in this area and to connect key arterial routes. It connects Paerata Road □SH22□ the 2□DPL, Cape Hill Road, and Pukekohe □ast Road with each intersection likely to be controlled by a roundabout.
- .□□□ The road follows the unformed alignment of Butcher Road between SH22 and the NIMT railway, and a new alignment for the remainder. The environment west of Cape Hill Road is expected to be urban on both sides and the environment east of Cape Hill Road is expected to be rural on both sides through the centre with urban on one side near Pukekohe □ast Road.

Interdependencies and Staging

- .□□□□ The AT□ notes this Project could be implemented as a stand-alone project to provide an alternate route □bypass□ around this □uadrant of Pukekohe. Without this Project the southern end of the 2□DPL project would be connected to nothing and may only be implemented as far south as Cape Hill Road.
- .□□7 I expect it may also be feasible to construct this Project in sections by providing a link between SH22 and 2□DPL or Cape Hill Road at a different time to the eastern section.
- .□□□□ The FDS lists the Project as a prerequisite for development of Pukekohe Northeast “Not before 2040□□”

Property Access

- .□□9 The AT□ indicates that existing property access “*will be retained where feasible*”. It expects that access to one or two properties may be affected with an additional □ourney time of up to two minutes.
- .□70 A relatively small area of land would end up being surrounded by SH22 on the western side, the MBB railway on the northern side, the NIMT railway on the eastern side and the Project on the southern side. Access on the SH22 frontage is constrained by the height difference as SH22 passes beneath the MBB railway and by limited sight distances to the north. It appears these properties currently utilise the Butchers Road reserve for access.
- .□7□ It appears the only practicable option for access to this land is from the western end of the Project away from the embankment rising to the new bridge over the NIMT. In that case I would expect access to be limited to left-in and left-out movements. The roundabouts at SH22 and 2□DPL are about 700m apart so a detour could be up to □4km long. Depending on

the delays at each roundabout the additional travel time could be around 3 minutes at peak times so I consider the AT estimate of 2 minutes could be understated.

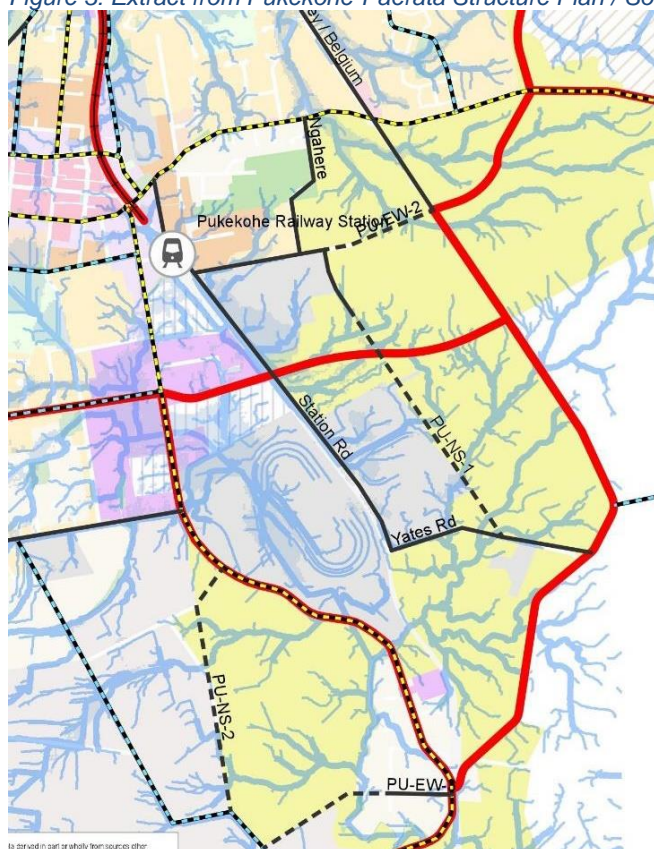
NOR5: Pukekohe South-East Arterial



Design and Changes to Network

- 72 This Project is intended to provide the two-lane 0m south-eastern quadrant of the “ring route” and it:
- a widens Pukekohe East Road between the Pukekohe East Road-Belgium Road-Golding Road East Street roundabout and the proposed 4PN roundabout to add active mode paths along the southern side of the road
 - b enlarges the Pukekohe East Road-Belgium Road-Golding Road East Street roundabout to two circulating lanes
 - c widens and urbanises Golding Road between Pukekohe East Road and Royal Doulton Drive providing separate active mode paths on both sides
 - d creates a new section of road with active mode paths on both sides running from a new single-lane roundabout on Golding Road, over Station Road and the NIMT railway, to a new roundabout at the intersection of Crosbie Road-Wrightson Way-Svensden Road
 - e realigns the western end of Svensden Road which in turn connects with Manukau Road at an existing single-lane roundabout.
- 73 No connection with Station Road is proposed. Svensden Road currently has a footpath on the southern side and no path on the northern side. The Project retains a footpath on the southern side and adds separate paths on the northern side.
- 74 The stated purpose of this route is to connect land currently separated by the NIMT railway and to improve connections between south-western Pukekohe and the Pukekohe East Road – Mill Road corridor and the connections to the Southern Motorway and Waikato Expressway SH at Bombay.
- 7 This arterial will improve connectivity in south-eastern Pukekohe, although it does not connect directly to the eastern end of the 4 PN.
- 7 The PPSP planned road network, part of which is shown in Figure 3, includes an arterial route linking Buckland Road on the southern periphery of Pukekohe along Logan Road and Golding Road, meeting the eastern end of a link to Svensden Road, and then connecting with the eastern end of 4 PN via a new alignment.
- 77 The AOA summarises some recommendations of analysis following the South DBC including consideration of reducing embodied carbon through investigating the upgrading of existing roads, the opportunity to better support urban development on either side of Golding Road, and a desire to avoid wetlands. The AOA also summarises consideration of four alternate routes for the northern and western sections of this route. The routes east of Golding Road were discarded due to impacts on the tuff ring, potential impacts on wetlands and bat habitat, the amount of land required, and traversing difficult topography.

Figure 3: Extract from Pukekohe-Paerata Structure Plan / Southern ITA



Interdependencies and Staging

- 7□ The AT□ notes this Project could be implemented separately from the other projects. It also appears that this project could be implemented in parts, potentially with the upgrading of Golding Road occurring separately from the east-west connection between Svendsen Road and Golding Road.
- 79 The FDS lists the Project as a prerequisite for development of Pukekohe East “Not before 2035+”) and Pukekohe Southeast “Not before 2040+”.

Property Access

- 0 As this Project includes parts of Pukekohe East Road, Golding Road, Crosbie Road and Svendsen Road there is potential to affect property access, particularly west of the NIMT railway which is urban. The AT□ notes that property access near the Svendsen Road-Crosbie Road intersection will be realigned and regraded. Property access on the remainder of this route is not recommended in the AT□ and this road is expected to have a raised median preventing right turn movements at property access points.
- Properties on the eastern side of the railway are expected to be redeveloped in future with access rearranged to be from collector roads rather than directly from Golding Road where possible.
- 2 The AT□ expects up to four properties would have access restricted to left-in and left-out movements and has determined the additional journey time to be up to two minutes. Inspection of the general arrangement drawings suggests that there could be more dwellings where right turn movements could be removed.
- 3 Properties between the east-west section and Pukekohe East Road would be able to use the roundabouts at each end of that section, which are about 1km apart, to undertake U-turns, resulting in additional travel distances of around 2km. Properties south of the east-west section may have significantly longer detours if right turn movements are removed.

Parking

- 4 Parking is not restricted on Pukekohe East Road or Golding Road except at intersections. There appears to be little demand for on-street parking on these roads and I expect that is attributable to the low-density rural land use and the lack of attractive locations for roadside parking. I expect the Projects would have little to no impact on parking on these roads.
- On-street parking is not restricted on Svendsen Road, although the narrow marked shoulders are likely to discourage parking on this road, and the lack of direct property access fronting this road appears to result in little to no demand for on-street parking in the western part of this road, but adjoining land use does create some demand for on-street parking in the eastern end. Parking is prohibited on both sides of Wrightson Way, and there appears to be a moderate to high demand for on-street parking in Crosbie Road and Austen Place. I expect the removal of parking from Svendsen Road due to the Project is likely to result in the demand for on-street parking in Crosbie Road and Austen Place becoming high to very high.

NOR 6: Pukekohe South-West Upgrade



Design and Changes to Network

- This Project connects the western end of APSA in Svendsen Road with Helvetia Road via John Street, Nelson Street, Ward Street, Puni Road and West Street.
- 7 The stated purpose of the project is to “provide for targeted intersection treatments that support safer active mode facilities” but much of the land to be designated is away from intersections, and no changes to intersection controls are proposed. Rather, the required land facilitates adding a bi-directional cycle way along one side of the corridor.
- The project also involves provision of footpaths on both sides of each road as some sections of Nelson Street, Ward Street, and Puni Road currently have a footpath on one side.
- 9 In my view the land requirements for this project could be considered to be reasonably necessary only if the provision of a cycle facility along this corridor is seen to be reasonably necessary. In my view the provision of a cycle facility is highly desirable, but perhaps not “essential” as the transport network could still function without it, although with deficiencies in the ability for people to travel by bicycle.

Safety

- 90 As noted earlier, I have significant concerns about conflicts at driveways along the proposed path and consider the Project could have an adverse impact on safety, contrary to the stated purpose.
- 91 I request the RA provide information on this at the hearing however, my preliminary view is that this Project has significant adverse effects, is not in accordance with the stated purpose, and is not reasonably necessary.

Interdependencies and Staging

- 92 The AT considers this Project could be implemented separately from the others as no other Project depends on it, and it does not depend on any of the other Projects.
- 93 The FDS lists the Project as a prerequisite for development of Pukekohe Southwest “Not before 2035+”.

Property Access

- 94 In this case there are multiple existing property accesses along the route and the ATE says “it is expected that all will be retained”²⁷. As noted above, I consider the project is likely to result in poor safety outcomes at driveways.

²⁷ Pg 71, ATE

Parking

- .□9□ As with the other projects, based on the General Arrangement drawings I do not expect on-street parking to be retained along this corridor adjacent to the proposed cycle path, although that decision is proposed to be deferred to the future detailed design and OPW process.

NOR 7: Pukekohe North-West Arterial



Design and Changes to Network

- .□9□ This Project connects Helvetia Road with SH22 and forms the North-Western quadrant of the “ring route.” The project is predominantly a new route and is proposed to be a two-lane urban arterial with a 40km/h speed limit and active mode facilities on both sides. The Project includes
- a□ a new single-lane roundabout at the intersection of Helvetia Road□Birdwood Road □ Kauri Road□
 - b□ widening and urbanisation of Helvetia Road from Birdwood Road to Gun Club Road□
 - c□ a new dual-lane roundabout at the intersection of Helvetia Road□Heights Road□Gun Club Road□
 - d□ a new link between Helvetia Road and Beatty Road, partly along an unformed section of Keith Road and then through a reverse-curve□
 - e□ a new dual-lane roundabout on Beatty Road□
 - f□ a new section of road between Beatty Road and Butcher Road□
 - g□ a new dual-lane roundabout on Butcher Road, with part of Butcher Road realigned□
 - h□ widening and urbanisation of the northern end of Butcher Road through to the new 4:PN□A roundabout on SH22.
- .□97 The AT□ explains the intent of this arterial is to support surrounding development and to connect the north-western part of Pukekohe with SH22 and 4:PN□A.

Interdependencies and Staging

- .□9□ This Project could be implemented in isolation and provide improved access to this part of Pukekohe. The benefits would be greater once 4:PN□A is in place, particularly when the Paerata Arterial segment of 2:DPL is also in place.
- .□99 The FDS lists the Project as a prerequisite for development of Pukekohe Northwest “Not before 2040+”.

Property Access

- .200 While some sections of this route are a new alignment, the AT□ expects that up to eleven properties may need to have access arrangements changed with some having movements restricted to left-in and left-out. The AT□ assesses the additional journey time for the right-turn detours to be less than one minute.
- .20□ The longest detours are likely to occur along the Helvetia Road as the two proposed roundabouts will be 400m apart, and I expect most affected property accesses will be located in this section. Unlike some other sections the alternative connections available via Birdwood Road and the other roads may mean that the additional journeys to circumvent the removal of the right turn movements may be less than 1km. On the other sections proposed roundabouts are around 400m apart and few if any properties are likely to be affected.

- .202 The AT□ also notes that development areas are likely to have access from a new collector road network yet to be determined.

NOR 8: Mill Road and Pukekohe East Road Upgrade



- .203 Some parts of this Project are within Auckland Region and some are in Waikato District in Waikato Region. The regional boundary runs along the road reserve from the west side of Runciman Road in the west to a point about □□0m west of the Bombay Interchange.
- .204 The speed limit on this route is proposed to be □0km/h. The stated intent is to improve safety, capacity, and travel choice on this corridor.

Auckland Region

Design and Changes to Network

- .20□ This Project involves adding active mode paths on the southern side of Pukekohe East Road between □PSWA, past the 4PN□A roundabout to the regional boundary and beyond. No changes are proposed to the carriageway or the northern side of the road.
- .20□ A proposed dual-lane roundabout at the intersection with Harrisville Road and widening of the carriageway to four lanes east of Harrisville Road requires additional land on the northern side of this section. Land on the southern side of the road is also required east of the regional boundary.
- .207 A new dual-lane roundabout is proposed approximately 400m west of the Bombay Interchange, and two side connections to this roundabout would provide for some combined property accesses. This roundabout and the access formation requires land on both sides of the road. The Project ends a short distance east of this roundabout where it is proposed to tie in with the SH□Papakura to Bombay project which is expected to provide a four-lane cross-section through to the Bombay Interchange.

Interdependencies and Staging

- .20□ As noted in the AT□ this Project could be implemented stand-alone to provide for increased capacity and safety on this corridor, although without 4PN□A and/or □PS□A the western end of the corridor may experience increased volumes on the existing alignment leading to poorer safety outcomes, so the benefits would be improved with 4PN□A and/or □PS□A in place.
- .209 The FDS lists the Project as a prerequisite for development of Pukekohe East “Not before 2035+”.
- .2□0 The Auckland and Waikato notices for this single project are interdependent. If one of the notices is not supported the Project could not be implemented as proposed.

Property Access

- .2□□ The AT□ expects that all properties on Pukekohe East Road would be retained, although some may need to be regraded.
- .2□2 The AT□ does not state if property accesses on Mill Road are expected to be retained. As this is an NZTA project, I expect this road could become a State Highway and/or a Limited Access Road, in which case property accesses may be reviewed and rationalised as part of a separate process.
- .2□3 The General Arrangements drawings show a median island as part of the four-lane section east of Harrisville Road. The drawings do not show any type of median on Pukekohe East Road, but the ATE states “Median may be raised or include a barrier to improve safety”

outcomes. Flush medians may be used in some locations. This will be determined at detailed design.”²⁸

- 2□4 For properties located east of Harrisville Road, the Project includes a new roundabout at □□□ Mill Road to facilitate U-turn right-turn detours for one of the directions of travel. The other direction of travel could use the proposed roundabout at Harrisville Road. Those roundabouts are □□km apart. The AT□ suggests the additional journey time would be around three to four minutes.
- 2□□ It is possible a median barrier that would prevent right turn movements could be introduced in the two-lane section west of Harrisville Road. If that occurs detours in one direction could use the Harrisville Road roundabout. There is no suitable location for U-turn movements in the other direction and those movements are likely to occur in or around Runciman Road about □km west of Harrisville Road or at the 4PN□A roundabout a further □□km west once that roundabout is constructed.
- 2□□ I consider that without a suitable U-turn facility west of Harrisville Road the possible removal of right turn movements at properties along this section could result in lengthy detours and poor safety outcomes. I recommend the RA provide additional information for the hearing on this matter.

Waikato Region

Design and Changes to Network

- 2□7 Within Waikato the Project involves widening the corridor on the south side west of Harrisville Road to provide for a wide swale and active mode paths□ on the south side of the road together with sizeable batter slopes.
- 2□□ The new dual-lane roundabout at the Harrisville Road intersection requires land on the southern side of the main corridor and on both sides of Harrisville Road. The proposed active mode paths stop a short distance along Harrisville Road.
- 2□9 This Project involves widening Mill Road to four lanes between the Southern Motorway and Harrisville Road with active mode paths□ on the southern side. It also involves adding active mode paths□ with a combined width of 4.□m on the southern side of Pukekohe East Road between Harrisville Road and NOR □□PSWA. The speed limit is proposed to be □0km/h. The stated intent is to improve safety capacity and travel choice on this corridor.
- 220 East of Harrisville Road through to the regional boundary the Project requires land on the southern side of the road to provide for widening the carriageway to four lanes with a median, swales, and active mode paths□ on the southern side of the road.

Interdependencies and Staging

- 22□ As noted in the AT□ this Project could be implemented stand-alone to provide for increased capacity and safety on this corridor, although without 4PN□A and/or □□PS□A the western end of the corridor may experience increased volumes on the existing alignment leading to poorer safety outcomes, so the benefits would be improved with 4PN□A and/or □□PS□A in place.
- 222 There may be considerable benefits in implementing the roundabout at the Harrisville Road intersection early to address safety and capacity issues.
- 223 The Auckland and Waikato notices for this single project are interdependent. If one of the notices is not supported the Project could not be implemented as proposed.

²⁸ Page 54, ATE

- .224 All comments for the Auckland Region also apply to the Waikato Region.

9 Construction Effects and Management Methods

All Projects

- 9.□ As noted above, given the longer implementation timeframes and the absence of detailed designs the general approach to effects generated by construction of the Projects is proposed to be addressed through the use of management plans.
- 9.2 Some Projects involve work in or alongside existing operational road corridors, and those projects have the most potential to disrupt the operation of the road network and occupants of adjacent properties.
- 9.3 The AT□ has assumed that each of the Projects will be constructed separately at different times and that construction effects would not overlap. The AT□ acknowledges that more than one Project could be under construction at the same time and considers this eventuality could be managed appropriately.
- 9.4 It is also possible that one or more of the Projects could be constructed at the same time as another infrastructure project in the area, and that has the potential to increase cumulative effects. For example, if works on Mill Road or Pukekohe East Road are undertaken at the same time as work on either SH22 or SH□ the impact could be substantially greater.
- 9.□ A condition to preclude this eventuality is considered to be unduly onerous as the management plan process should be sufficient to manage this eventuality and it is considered unlikely that there would be significant disruption on more than one corridor at the same time.
- 9.□ The AT□ recommends that a Construction Traffic Management Plan (CTMP) be prepared prior to the construction of any and all of the Projects and recommends several items that each CTMP should include.
- 9.7 The AT□ also provides Table □□□ that lists sites near some of the Projects that should be given special consideration when the CTMPs are prepared. The list includes rail stations, the school zone on Burt Road, and the commercial area on and near Svendsen Road.
- 9.□ The ATE has an expectation that contractors “will undertake a property specific assessment of any affected access and provide temporary access arrangements if required” and it states these requirements should be captured in the CTMP or a Site Specific Traffic Management Plan (SSTMP) if required.
- 9.9 I consider that provided the purpose of the CTMP is adequately described, but I consider that some amendments are required to the list of matters the CTMPs should address. I address the proposed conditions later.

10 Statutory Considerations

National

Government Policy Statement on Land Transport 2020

- 0.□ This policy is summarised and assessed in the ITA, and the four strategic priorities of the GPSLT are assessed below.

Safety

- 0.2 The GPS safety priority is developing a transport system where nobody is killed or seriously injured. All of the Projects provide for new and/or improved transport links of a high standard and will improve safety, with the possible exception of □PSWU.

Better Travel Options

- 0.3 This priority is summarised as providing people with better transport options to access social and economic opportunities. All of the Projects provide improved active mode facilities that will provide people with those transport options. The projects will also improve movement of other transport modes.

Climate Change

- 0.4 The GPS seeks to develop low carbon transport systems that support reductions in carbon emissions while improving safety and inclusive access. The AT□ describes the analysis of the project and states the Projects will collectively result in a reduction in VKT compared to a scenario where all of the development occurs in the absence of the Projects. While I consider that situation to be unlikely, particularly in light of the FDS linking development of growth areas with the provision of most of the Projects, I acknowledge that the projects are likely to result in a reduction in private vehicle VKT. As a result I consider the Projects would result in fewer operational carbon emissions.

Improving Freight Connections

- 0.□ The GPS seeks to prioritise the improvement of freight connections for economic development. Most of the Projects would improve freight connections by providing new links and by improving the travel time on most links in the sub-region.

Summary

- 0.□ I consider each project is consistent with and gives effect to this policy statement, with the exception of □PSWU.

National Policy Statement on Urban Development 202□

- 0.7 The NPS□UD sets out several objectives and policies

Well-Functioning Urban Environments

Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

- ...
(c) *have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport;*
and

- 0.□ The Projects are considered to be essential to this policy being realised.

Infrastructure Readiness

Policy 2: Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.

- 0.9 The newly released Auckland FDS sets out development capacity and links this with the provision of key infrastructure including most of the Projects. I consider those Projects listed in the FDS □all but 3□PC□are required to realise this policy.

Emissions Reduction Plan

0.0 The national Emissions Reduction Plan (ERP) has three focus areas for reducing transport emissions over the next 30 years²⁹

- reduce reliance on cars and support people to walk, cycle and use public transport
- rapidly adopt low-emissions vehicles
- begin work now to decarbonise heavy transport and freight.

0.00 The ERP sets four targets to support the focus areas

Target 1 – Reduce total kilometres travelled by the light fleet by 20 per cent by 2035 through improved urban form and providing better travel options, particularly in our largest cities.

Target 2 – Increase zero-emissions vehicles to 30 per cent of the light fleet by 2035.

Target 3 – Reduce emissions from freight transport by 35 per cent by 2035.

Target 4 – Reduce the emissions intensity of transport fuel by 10 per cent by 2035.

0.02 The implementation of all of the Projects is estimated to produce a reduction in VKT compared with none of the Projects being implemented but with all forecast growth still occurring. The Projects are considered to be consistent with Target 1.

Auckland

Regional Policy Statement

0.03 Relevant objectives and policies that are relevant to transport are identified below.

B2 Urban Growth and Form

0.04 This section identifies a number of issues and states

Growth needs to be provided for in a way that does all of the following:

- (1) enhances the quality of life for individuals and communities;
- (2) supports integrated planning of land use, infrastructure and development;
- ...
- (5) enables provision and use of infrastructure in a way that is efficient, effective and timely;
- (6) maintains and enhances the quality of the environment, both natural and built;
- ...

0.00 These Projects would provide transport infrastructure that directly addresses issue 0.00. These issues are reflected in a number of Objectives including

Objective B2.2.1 (1)

A quality compact urban form that enables all of the following:

- ...
- (c) better use of existing infrastructure and efficient provision of new infrastructure;
- (d) improved and more effective public transport;
- ...
- (g) reduced adverse environmental effects.

0.00 Project 00DWA provides bus lanes and access to Ngākōroa Station from the south. Project 30PC provides access to Paerata Station from the south and east, so these projects provide for more effective public transport.

²⁹ Pg 172, Emissions Reduction Plan, Ministry for the Environment, Wellington June 2022.

Objective B2.2.1 (5)

The development of land within the Rural Urban Boundary, towns, and rural and coastal towns and villages is integrated with the provision of appropriate infrastructure.

- 0.17 The Projects provide the infrastructure that the FDS integrates with the development of land.

B2.2.2 Policies

(4) *Promote urban growth and intensification within the urban area 2016 (as identified in Appendix 1A), enable urban growth and intensification within the Rural Urban Boundary, towns, and rural and coastal towns and villages, and avoid urbanisation outside these areas.*

(5) *Enable higher residential intensification:*

(a) *in and around centres;*

(b) *along identified corridors; and*

(c) *close to public transport, social facilities (including open space) and employment opportunities.*

- 0.18 The Projects enable urban growth, and in relation to the FDS are required for that growth to occur.

B2.4. Residential Growth

B2.4.2 Policies – Residential Intensification

(6) *Ensure development is adequately serviced by existing infrastructure or is provided with infrastructure prior to or at the same time as residential intensification.*

- 0.19 The Projects provide infrastructure which is intended to be implemented prior to residential intensification.

B3.3 Transport

Objective B3.3.1

(1) *Effective, efficient and safe transport that:*

(a) *supports the movement of people, goods and services;*

(b) *integrates with and supports a quality compact urban form;*

(c) *enables growth;*

(d) *avoids, remedies or mitigates adverse effects on the quality of the environment and amenity values and the health and safety of people and communities; and*

(e) *facilitates transport choices, recognises different trip characteristics and enables accessibility and mobility for all sectors of the community.*

- 0.20 The Projects collectively do all of these things.

B3.3.2 Policies

(1) *Enable the effective, efficient and safe development, operation, maintenance and upgrading of all modes of an integrated transport system.*

...

(4) *Ensure that transport infrastructure is designed, located and managed to:*

(a) *integrate with adjacent land uses, taking into account their current and planned use, intensity, scale, character and amenity; and*

(b) *provide effective pedestrian and cycle connections....*

- 0.21 Together with the FDS and other instruments that provide for integration, the Projects achieve each of these items.

- (5) *Improve the integration of land use and transport by:*
 (a) *ensuring transport infrastructure is planned, funded and staged to integrate with urban growth;*
 ...

□0.22 The Projects enable the provision of transport infrastructure to support urban growth.

Auckland Plan 20□0

□0.23 The RPS describes the Auckland Plan as□

The Auckland Plan, being the spatial plan required to be prepared and adopted under sections 79 and 80 of the Local Government (Auckland Council) Act 2009 as a comprehensive and effective long-term (20- to 30-year) strategy for Auckland's growth and development, is a relevant statutory planning document for the preparation of the regional policy statement.

□0.24 As noted in the ITA, the Auckland Plan 20□0 □AP□ identifies si□ Outcomes, one of which is Transport and Access, which has three Directions and seven Focus Areas.

Direction 1: Maximise safety, environmental protection and emissions reduction

□0.2□ The AP notes that in 2020, Auckland Transport adopted Vision Zero which follows the Safe System approach. The Projects have been and will continue to be designed following the Safe System approach, and I consider the Projects will ma□imise safety, with the e□ception of □PSWU.

□0.2□ □missions are discussed below.

Direction 2: Better connect people, places, goods and services

□0.27 The Projects provide for better connections.

Direction 3: Increase genuine travel choices for a healthy, vibrant and equitable Auckland

□0.2□ The Projects provide active mode facilities and are e□pected to improve the operation of bus services and access to rail services.

Focus area 1: Make better use of existing transport networks

□0.29 This focus area discusses the e□pense of widening roads, and making the most efficient use of the roads we have by changing the demands we put on them. The focus area proposes encouraging greater use of public transport and active modes.

□0.30 The Projects involve both new and e□isting roads, together with public transport, which have been considered as a whole network.

Focus area 2: Target new transport investment to the most significant challenges

□0.3□ This focus area discusses the importance of strategic planning to make the best use of transport funding. These Projects represent that strategic planning and investment.

Focus area 4: Make walking, cycling and public transport preferred choices for many more Aucklanders

□0.32 This focus area states, "*Reducing congestion and emissions will only be possible if more Aucklanders walk, cycle and use public transport*". The active mode facilities and improved access to rail stations provided by the Projects are compatible with this focus.

Focus area 5: Better integrate land-use and transport

- 0.33 These Projects provide the transport that documents such as the FDS integrate with land use.

Focus area 6: Move to a safe transport network free from death and serious injury

- 0.34 This focus area discusses the goal of reducing death and injury caused by travel on the road network. The Projects improve the quality of the road network by providing safer designs and additional capacity which is expected to result in traffic diverting from more hazardous rural roads onto less hazardous new roads. I have safety concerns in relation to □PSWU.

Focus area 7: Develop a sustainable and resilient transport system

- 0.3□ This focus area discusses the need to improve the resilience of or transport system in response to disruption, including disruption from accidents or incidents, weather events, or other changes. By adding a new road connection through this area to Pukekohe and additional routes in and around Pukekohe, Drury and Paerata the Projects improve resilience.

Summary

- 0.3□ I consider the Projects to all be consistent with, and give effect to, the Auckland Plan and FDS, with the possible exception of □PSWU.

Te Tāruke ā Tāwhiri Auckland Climate Plan

- 0.37 The climate plan is a document related to the Auckland Plan. The plan has eight priorities including Transport.

Transport

- 0.3□ The plan seeks to reduce emissions from transport. It states□

While there are many potential pathways to our goal, we need to make significant changes to:

- *how and where we live*
- *how we conduct and power our personal travel*
- *how we transport our freight*
- *how much we travel*
- *how we grow as a region.*

- 0.39 It also states□

The highest priority is reducing emissions generated by light passenger vehicles and commercial vehicles, given these generate about 80 per cent of on-road emissions.

- 0.40 This priority has some Action Areas.

Action area T1. Changing the way we all travel

- *Encourage the use of public transport, walking and micro-mobility devices, rather than driving.*
- *Shorten private vehicle trips, and fulfil several travel needs at once including for business purposes.*
- *Choose lower emissions vehicles when purchasing, sharing, or leasing.*
- *Reduce private vehicle travel and encourage lower emissions travel options by introducing pricing and parking measures.*

- 0.4□ The Projects address the first point by providing active mode facilities and improving access to rail stations.

Transport Emissions Reduction Pathway

- 0.42 This document (TRP) endorsed by Auckland Transport and adopted by Auckland Council, is intended to give effect to the climate plan. It directs the activities of the Council and AT, describes eleven transformation areas, and provides an implementation pathway.

Reduce Travel

- 0.43 The TRP seeks to reduce travel where possible and appropriate. One measure is “restricting road expansion that induces light vehicle travel.” This is based on the hypothesis that road expansion projects (new or wider roads) can stimulate additional travel, which could undermine the goal.
- 0.44 In my view that hypothesis should not in and of itself prevent widening of an existing road or the construction of a new road, as not all expansion projects induce significant additional travel, not all additional travel is undesirable, and such projects can reduce congestion and emissions.
- 0.45 The TRP seeks to use VKT as a measure of travel. VKT is a travel metric that is not readily measurable, and I consider it to be a poor proxy for transport emissions. It takes no account of the type of vehicle being used, the number of people in the vehicle, or the fuel used (and hence emissions) per kilometre of travel, which is sensitive to speed and changes in speed so highly sensitive to congestion. It also does not account for any economic or other benefits associated with the travel.
- 0.46 Additional development requires additional travel, so additional VKT is a somewhat inevitable part of enabling people and communities to provide for their social, economic and cultural wellbeing, health and safety.
- 0.47 Nevertheless, the AT states that collectively the projects reduce congestions and VKT compared to the scenario with all development and none of the Projects.

Build Up Not Out

- 0.48 One of the transformations in the area of reducing reliance on cars, is “6 Build up not out” which includes planning for an increase in sustainable modes, a reduction in light vehicle VKT, reducing the scale of urban expansion, and locating more intensive development in areas with good access to opportunities. The pathway includes upzoning around areas of high access.
- 0.49 The TRP states

...

More intensive development around places with good access to opportunities. Auckland is a rapidly growing city, and its population growth is projected to continue. To minimise transport emissions, much more growth needs to occur near existing and emerging employment hubs and in areas with good access to jobs, services and amenities, so that it is easier for people to access these opportunities via sustainable modes of transport. It is also easier and more cost-effective to deliver sustainable transport options in higher density areas.

More growth is also needed in locations which are best served by PT. While recent government driven changes have set a minimum level of density that councils must permit around rapid transit stations, council and the government must do more to support mixed-use urban renewal around PT stations in the near term. While quality development in an area can incentivise further development other cities are more explicitly incentivising development within the walkable catchment of their rapid transit networks, and some have set explicit targets for the proportion of new dwellings that should be located within these catchments.

- 0.50 While the Projects partly enable expansion into greenfield rural areas, these are areas that Auckland Council has identified as being appropriate for growth. The Projects primarily facilitate the expansion of Drury, Paerata, and Pukekohe which are all locations with access

to rapid transit rail services and employment hubs with good access to jobs, services and amenities.

Future Development Strategy

0.01 The FDS has five principles. Those most relevant to transport are summarised below.

Principle 1: Support greenhouse gas emission reduction

0.02 A compact urban form is seen as a critical requirement, as it reduces car dependency and vehicle kilometres travelled (VKT). This is addressed above.

Principle 3: Make efficient and equitable infrastructure investments

0.03 Principle 3a is “Take a regional view to infrastructure investment and costs”. In my view the assessment of the Projects has done this.

Principle 5: Enable sufficient capacity for growth in the right place and at the right time

0.04 The Projects enable transport capacity for growth.

0.05 In my view the Projects collectively support the FDS.

Waikato Region

Waikato Regional Policy Statement

0.06 The Waikato RPS sets out objectives and policies with domains and topics, with the relevant matters for this assessment being within Urban Form and Development. The RPS Urban Form and Development section includes objectives relating to the integration of land use and infrastructure planning, including

3. *integrating land use and infrastructure planning, including by ensuring that development of the built environment does not compromise the safe, efficient and effective operation of infrastructure corridors;*
5. *recognising and protecting the value and long-term benefits of regionally significant infrastructure;*
8. *anticipating and responding to changing land use pressures outside the Waikato region which may impact on the built environment within the region;*

0.07 I consider the IMPU Project to be consistent with, support, and give effect to the RPS with respect to transport matters to protect the route of future infrastructure corridors and by responding to land use pressures in Auckland.

Waikato Regional Policy Statement Change

0.08 This change to the RPS addresses the National Policy Statement on Urban Development 2020 and Future Proof Strategy update, with a decision pending at the time of writing this report.

0.09 The notified version of this change added another point to the UFD Objective

12. *strategically planning for growth and development to create responsive and well-functioning urban environments, that:*
 - a. *support reductions in greenhouse gas emissions and are resilient to the current and future effects of climate change;*
 - b. *improve housing choice, quality, and affordability;*

- c. *enable a variety of homes that enable Māori to express their cultural traditions and norms;*
- d. *ensure sufficient development capacity, supported by integrated infrastructure provision, for identified housing and business needs in the short, medium and long term;*
- e. *improves connectivity within urban areas, particularly by active transport and public transport;*
- f. *take into account the values and aspirations of hapū and iwi for urban development.*

0.0 I consider the IMPU Project to be consistent with the notified version of the RPS Change by providing development capacity and improving connectivity.

Waikato District

Waikato Operative District Plan – Franklin Section

0.0 The Operative plan sets out a number of objectives and policies relating to transport including minimising conflict through the use of a road hierarchy to manage the balance between safety and property access, ensuring a safe roading network, and to ensure that the construction modification and use of roads do not cause adverse effects. I consider the IMPU Project to be consistent with those objectives.

Proposed Waikato District Plan – Appeals Version

0.2 Relevant objectives and policies in the Strategic Directions section include

*SD-05 Integration of infrastructure and land use.
New development is integrated with the provision of infrastructure.*

*SD-07 Regionally significant infrastructure and industry
Recognise the importance of regionally significant infrastructure and regionally significant industry.*

0.3 I consider all of the Projects are consistent with these objectives.

0.4 Relevant objectives in the All Infrastructure section include

*AINF-O1 Development, operation and maintenance of infrastructure.
Infrastructure is developed, operated, maintained and upgraded to enhance social, economic, cultural and environmental well-being*

*AINF-O3 Infrastructure in the community and identified areas.
Provision of Infrastructure takes into account the qualities and characteristics of surrounding environments and community wellbeing.*

AINF-O8 Land transport network.

(1) *An integrated land transport network where:*

(a) *All transport modes are accessible, safe and efficient; and*

(b) *Adverse effects from the construction, maintenance, upgrading and operation of the transport network are avoided, remedied or mitigated;*

(c) *Strategic road and rail corridors play an important role in the district for facilitating the movement of inter and intra-regional freight; and*

(d) *There is an effective and efficient land transport system that enhances economic well-being, and supports growth and productivity within the Waikato region and upper North Island.*

0.0 I consider the transport aspects of the IMPU Project are consistent with these objectives with suitable amendments to conditions with respect to AINF 0 b

0.0 Relevant policies in the All Infrastructure AINF section include

AINF-P1 Development, operation and maintenance.

- (1) *Provide for the development, operation, maintenance, repair, replacement, upgrading and removal of infrastructure throughout the district by recognising:*
 - (a) *Functional and operational needs;*
 - (b) *Location, route and design needs and constraints;*
 - (c) *Locational constraints related to the need to access suitable resources or sites;*
 - (d) *The benefits of infrastructure to people and communities;*
 - (e) *The need to quickly restore disrupted services; and*
 - (f) *Its role in servicing existing consented and planned development;*
 - (g) *The need for physical access to infrastructure.*

AINF-P29 Construction, maintenance, upgrading and operation of the land transport network.

- (1) *Provide for the construction, maintenance, upgrading and operation of an efficient, effective, integrated, safe, resilient, accessible and sustainable transport network through:*
 - (a) *Corridor, carriageway and intersection design which is appropriate to the road function as specified in the road hierarchy and in accordance with relevant guidelines;*
 - (b) *The appropriate design and location of sites' accesses;*
 - (c) *Traffic signage, road marking, lighting, rest areas and parking as appropriate;*
 - (d) *Safe and accessible provision for pedestrians and cyclists to maximise accessibility, including off-road facilities and connections;*
 - (e) *Corridor and carriageway design which enables provision of public transport;*
 - (f) *Provision for other infrastructure, including where suitable low impact design stormwater facilities;*
 - (g) *Provision for stock underpasses where suitable access is not readily available;*
 - (h) *Discouraging the installation of new at grade road and pedestrian rail level crossings:*
 - (i) *Controlling the location of buildings and other visual obstructions within the sightline areas of rail level crossings; and*
 - (ii) *Railway crossing design in accordance with the requirements of the rail operator.*
 - (i) *Protection and promotion of the development of the regional rail network for the transportation of freight; and*
 - (j) *Development of efficient processes and freight routes for the movement of high productivity motor vehicles through the region.*

AINF-P35 Land transport network infrastructure

- (1) *Ensure that land transport network infrastructure is developed so that:*
 - (a) *The design, location, alignment and dimensions of new land transport networks provide safe vehicle, pedestrian and cycling access and manoeuvring to every site;*
 - (b) *The land transport network provides good connectivity to the site and integrates with adjacent developments and identified as future growth areas including walking and cycling networks and facilities and public transport;*
 - (c) *There is adequate provision of on-site parking and manoeuvring for land use activities;*
 - (d) *Contaminants generated during construction are appropriately mitigated; and*

(e) *Design, alignment and dimension of new roads will accommodate the installation of network infrastructure in accordance with technical and safety specifications.*

0.7 I consider the transport aspects of the MPAU Project are consistent with these policies.

Waikato 2070

0.8 The Mill Road and Pukekohe East Road corridor upgrade will assist movement of people and freight in the Waikato and also includes active mode facilities, and I consider these align with Waikato 2070.

Climate Action Plan

0.9 The Projects are expected to result in a reduction in light vehicle travel with an associated reduction in emissions and is considered to be consistent with the Climate Action Plan.

11 Submissions

1.1 This section summarises the transport matters raised in submissions, and matters raised by the Franklin Local Board of Auckland Council.

1.2 Many of the submissions had transport concerns. In some cases transport concerns were expressed generally, and other submissions provided significant detail. I have addressed these matters project by project and topic by topic noting that several of the topics are interrelated and overlap.

1.3 Submissions that did not raise specific transport matters are not addressed in this report. Submissions that are neutral or expressed support either in general or for a specific matter are not addressed unless there are submissions opposing the same matter.

NOR 1: Drury West Arterial

Submission Locations



1.4 The following figure shows the approximate location of location-specific transport-related submissions.

Figure 4: Approximate location of property-specific submissions



Management of Effects

- Submission 4 (McKean Family Trust, 2 Runciman Road) requests that it is notified when the CTMP is prepared “to ensure the transport effects do not adversely affect the property”. The CTMP is reviewed by Council and the traffic management components must be approved by AT. In my view it is not appropriate for third party approval to be required, and I expect all property occupiers potentially affected by any road works would be consulted or notified. I do not support this submission.
- Submission (Ministry of Education) notes there are a number of schools in the area near each of the projects as shown on a map in the submission. In my view none of the schools are likely to be affected by construction of the DWA Project, however the CTMP condition applied to multiple Projects so I am neutral with respect to this submission in relation to this Project.

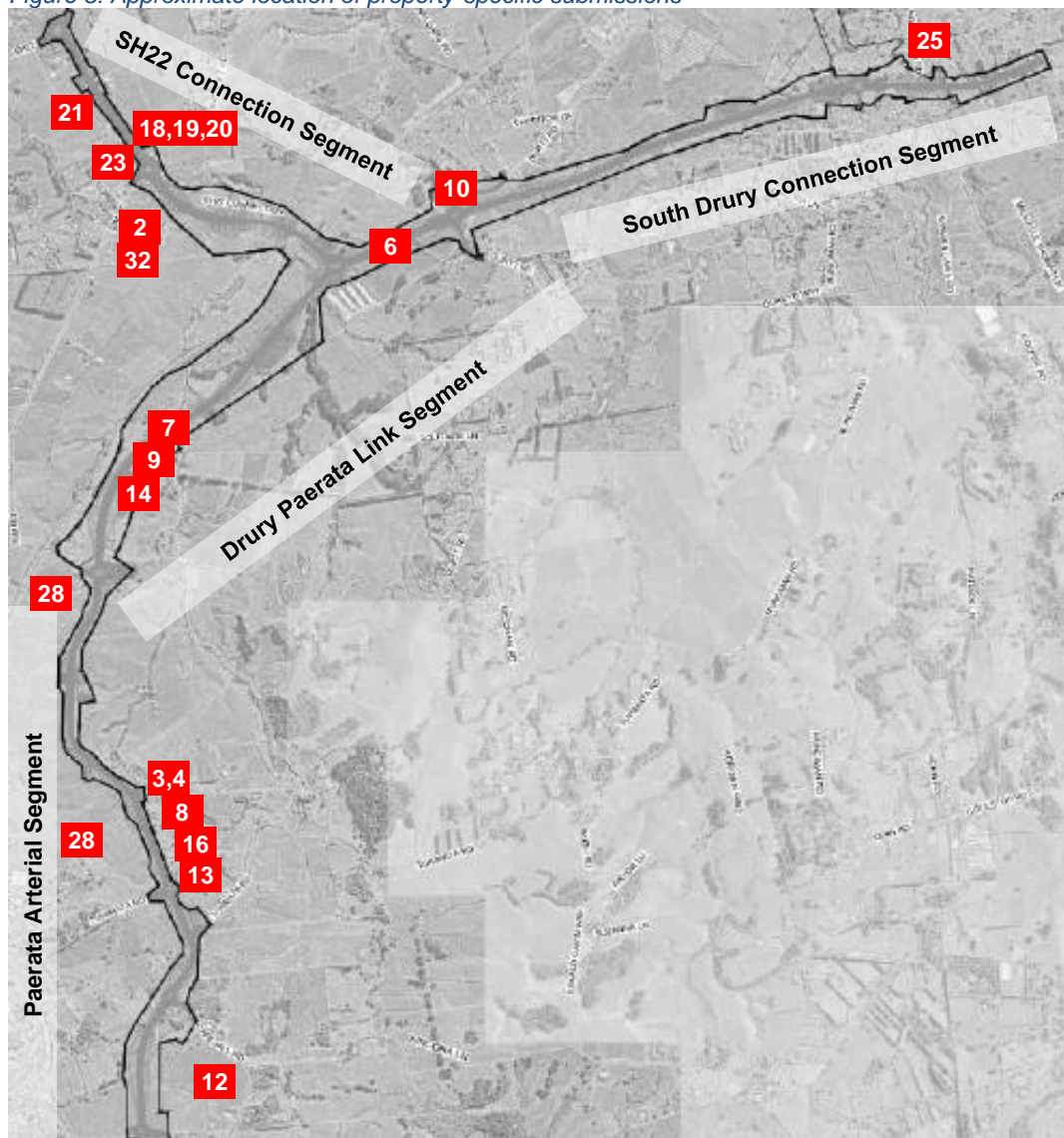
NOR 2: Drury-Pukekohe Link

Submission Locations



- 7 The following figure shows the approximate location of transport-related submissions.

Figure 5: Approximate location of property-specific submissions



Alternate Routes, Alignment, and Easements

Whole of Project

- Submission 3 on NOR □□□ Darou□□□, □40 Pukekohe □ast Road□□□ requests that the Notices be withdrawn or struck out. The submission suggests the best way of accommodating the expected growth is to build “*straight, direct, fast dual-lane expressways*” and that Package 4 providing a four-lane expressway along the DPL route should be preferred.
- 9 The AOA summarises the assessment of Package 4,³⁰ which was the option preferred in the 20□□ South Indicative Business Case. The revised multi-criteria assessment found the four-lane expressway scored best on safety, equal on integration, poorer on access, best on resilience, and worst on travel choice. The package was scored poorly on travel choice as it was considered the expressway might “*induce light vehicle travel which undermines mode shift.*” It appears this (that people might drive instead of walking, cycling, or using public transport) was the primary reason this package was discarded. It is not apparent from the information provided if that conclusion was supported by modelling.
- 0 There have also been changes in government policy and RMA legislation since 20□□, particularly requirements to have regard to emissions reduction plans.

³⁰ Pages 70-71, AOA

□□□□ The RA is required to demonstrate that they have adequately considered alternative routes or methods, and that the work is reasonably necessary. They are not required to demonstrate the best or most efficient alternative has been selected, that some alternative might also be reasonably necessary, or that they would not need to expand the designation at some point in the future. For that reason, regardless of the merits or drawbacks of a four-lane expressway alternative, I am unable to support this submission.

South Drury Connection Segment

□□□□ Submissions □ and □0 raise issues about the alignment of this section. Submission □ Joyce C, 37 Burt Road³¹ requests the alignment be placed as close as possible to the NIMT railway to avoid severing their farm. Submission □ Brown T, 397 Burt Road requests the alignment be moved further away from existing houses on Burt Road.

□□□□ A range of options for the eastern end the DPL³² have been assessed by SGA and the AOA summarises the reasons for the adopted alignment at that end of the 2DPL. Ten options were evaluated for the “North-South Corridor”³³, with none of the options being near these submitters, although none of the options shown in the notified material were located closer to the railway than Burt Road. Three options □3, 4, □0 were aligned along Burt Road, and option 3 was included in the short-list assessment as part of Package 3a. The school site, zoned Special Purpose – Education, located a short distance north east was one of the matters considered in assessing the alternative alignments.

Figure 6: Extract from AOA Figure 4-12 showing alignment options near Burt Rd



□□□□ I do not have sufficient information to determine if an alignment abutting the railway is feasible, and I expect the alignment would need to move away from the railway near the SH22 Connection Segment to provide sufficient separation between the roundabout and the bridge over the railway. Relocating the alignment closer to the railway would be likely to have adverse effects on the school zone. I am of the view that the assessment of alternatives in relation to this matter meets the relevant test and do not support these submissions.

SH22 Connection Segment

□□□□ Submissions □9 Trevlyn Enterprises and 20 Sim P are concerned that the proposed alignment would sever a farm and the proposed roundabout would have a significant impact on a home, farm buildings and a water bore. These submissions do not seek specific relief.

□□□□ Options for the SH22 Connection are summarised in the AOA. Two options were considered in the Draft Business Case □DBC and four options □□, 9, □0, SH22 Central were considered

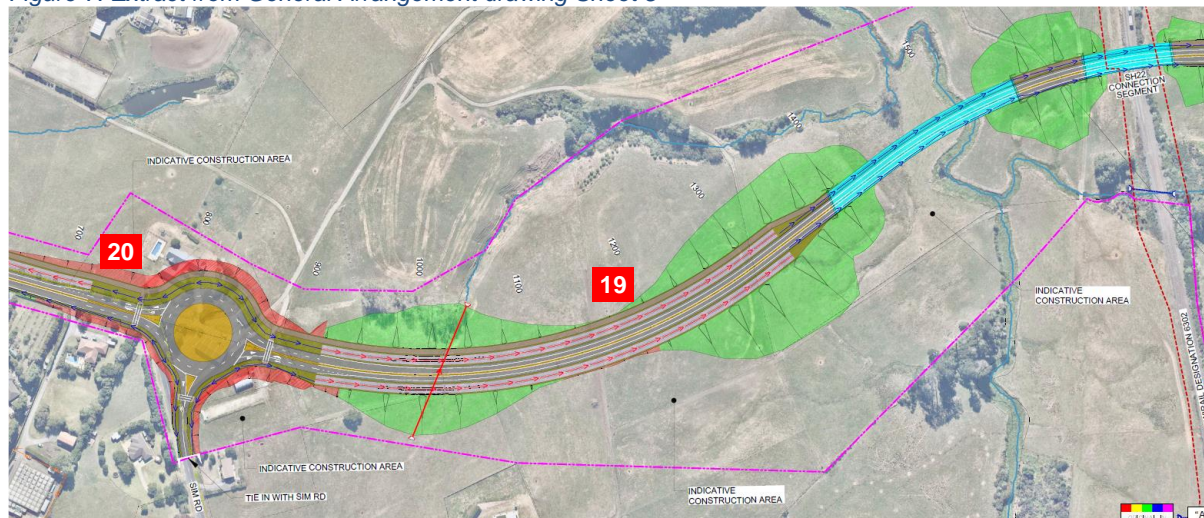
³¹ Auckland Council Geomaps and the Form 18 identify the property as 357 Burt Road, the submission provides a mailing address of 337 which appears to be the residence on this property.

³² Figure 4-4, page 38, AOA.

³³ Figure 4-12, page 59, AOA.

in later assessments shown in Figure above. Alignments along the northern part of Sim Rd were also considered in the Paerata Station connections PS Option 4³⁴.

Figure 7: Extract from General Arrangement drawing Sheet 5



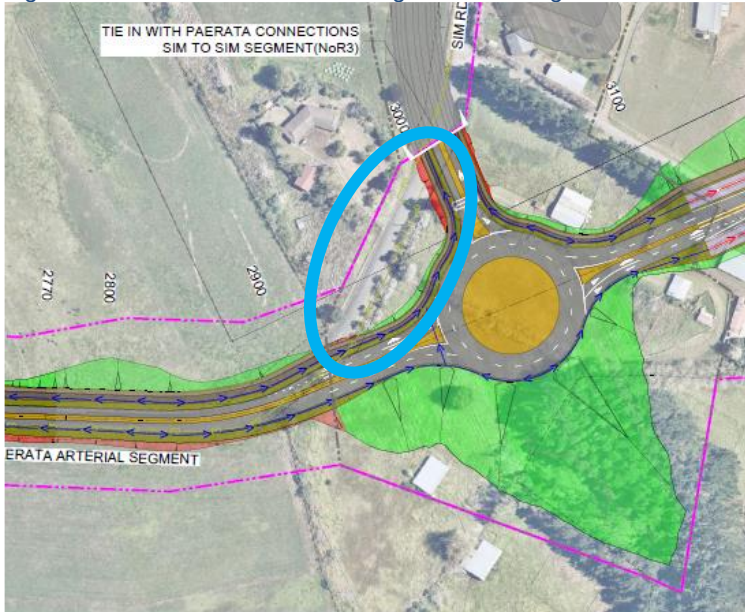
- 7 Most alignments propose using the northern part of Sim Road and then pass through farmland to cross the railway and connect with the other parts of the 2DPL. The absence of the connection across the railway is not considered desirable and an alignment away from Sim Road would presumably involve similar severance of operating farms.
- It appears feasible to relocate the roundabout further south away from the buildings to the north of Sim Road, but such a relocation would affect a greater number of other homes.
- 9 I consider the assessment of alternatives meets the relevant tests and do not support these submissions.

Drury-Paerata Link Segment

- 20 Submissions 7, 9, □4, and 2□ raised issues about this segment. Submission 7 □Ro M, 3□9□ Sim Road□ opposes the formation of the link and requests the preservation of a tree and bat habitat. Submission 9 □Ruddell J, 3□9C Sim Road□ considers alternative routes should be preferred, either along the Sim Road reserve to SH22, or along the eastern side of Sim Road. Submission □4 □XLU Ltd, 3□9B Sim Road□ requests the extent of the designation be reduced.
- 2□ Submission 2□ □Paerata □ Farms Ltd, 32□ and 4□2 Sim Road□ oppose the project for several reasons, including the efficient use of FUZ land and consider the area of FUZ land for the project should be reduced. The submission also notes the northern roundabout creates a portion of “no mans land” between the submitters land and the roundabout. I assume the submission is referring to the area of land circled in Figure □. That land lies within the designation. If a post-construction review of the designation determined that land is no longer required it would be disposed of in the usual way. I do not support that submission point.

³⁴ Figure 4-6, page 46, AOA

Figure 8: Extract from General Arrangement drawing Sheet 2



- 22 Using the Sim Road reserve to reconnect both ends of the road would provide an alternate connection between Pukekohe, Paerata and SH22, but would not provide a new connection between Paerata and Drury which is needed to supplement SH22 as increasing the capacity of SH22 is challenging in light of the urbanisation planned to occur along that corridor. Based on the evidence to date I consider the assessment of alternatives is sufficient and do not support these submission points.

Paerata Arterial Segment

- 23 Submissions 3 and 4 (Beaurain R and Beaurain BJ, 499 Sim Road), (Postles B and L, 479 Sim Road), (Carpenter D and S, 499 Sim Road) and (Berry R, 499 Sim Road) raise similar issues around the alignment north of Tuhimata Road where the route uses the existing Sim Road reserve. All of these submitters request the route be relocated, with four specifically requesting a move to the west, and one requesting the road be placed at a lower level to reduce noise and visual effects. One requests this section of road be moved west and straightened out.
- 24 Submission 2 (McCall G, 229 Cape Hill Road) is concerned the route divides a farm and requests the road be located closer to the railway. This property occupies much of the land west of Cape Hill Road south of Tuhimata Road and north of 499 Sim Road.
- 25 Submission 2 (Paerata Farms Ltd, 329 and 499 Sim Road) oppose this segment for the same reasons set out above.

Figure 9: Extract from General Arrangement drawing Sheet 1



- 26 The AOA report shows the options considered which includes three routes along Paerata Road (SH22) three alignments along this part of Sim Road, one east of but close to Sim Road, and one following Burt Road. It appears an option between Sim Road and the railway has not been considered to date.

□□

Figure 10: Extract from AOA Figure 4-12



- 27 An option west of Sim Road would result in fewer dwellings being exposed to traffic noise and other effects, but is likely to involve significant increases in earthworks, and a new intersection with Tuhimata Road a short distance from the existing intersection. A relocation could increase the impact on Submitter □2 unless the route were to be relocated close to the railway.
- 2□ Relocating the route to be close to the railway may be achievable for some of the route although I expect the route would need to move away from the railway to provide sufficient separation between the new bridge over the railway and a roundabout at the 2□DPL and 4□PN□A intersection. Such an alignment would remain with FUZ land.
- 29 □vidence on this matter would be useful to further examine the merits of such a realignment.

Design

- 30 Submission □0 □Brown T, 397 Burt Road□expresses the view that there are too many roundabouts which will result in more congestion and emissions. The submission requests the roundabouts be replaced with grade-separated interchanges.
- 3□ Submissions 2 □Owers S, □09 Sim Road□ 2□ □Roading and Asphalt Ltd, 3□ Sim Road, □□ Gellert Road, □39 Karaka Road□ 23 □Thompson, 72 Sim Road□ 3□ □Haddad P□and 32 □Ross H, □□□A Sim Road□are also of the view that there are too many roundabouts in close proximity. In conjunction with steep grades and one of the roundabouts being located at the top of a hill, the submissions are critical of the design and consider drivers of □heavy□vehicles are likely to choose an alternate route.
- 32 The SH22 Connection General Arrangement drawings show a roundabout at SH22, another at Sim Road □00m away, and one at the southern end a further □km away, and there are also roundabouts along the other segments of this Project at Burt Road □□00m□or the two 3□PC roundabouts □□00m apart□2km to the south.
- 33 Information about the vertical design □including road gradients□has not been provided, but I note the requirements to connect with existing roads near existing levels, and the need to cross the NIMT railway via a grade-separated structure. The northern SH22 roundabout is cut down on some sides with a small fill on the other side. The Sim Road roundabout is in cut, and the southern roundabout is placed on fill, so I assume submissions are referring to the central Sim Road roundabout being on a hill. The existing grades along Sim Road are moderate and would be reduced by the proposal.
- 34 While multiple roundabouts in close proximity may be annoying and even unattractive for some drivers, and the grades may discourage some heavy vehicle drivers from using the connection, I consider the new route would still be sufficiently attractive to most drivers. In my view the RA has adequately considered alternatives and the Project would still fulfil its objectives. On that basis I do not support these submissions.

- 3□ Submission 2□ □Paerata □ Farms Ltd, 32□ and 4□2 Sim Road□ says the design is poor as it provides for single lane roads and dual□lane roundabouts. I do not consider that to be poor design and do not support that submission point.

Property Access

- 3□ Submissions 3 and 4 □Beaurain R and Beaurain BJ, 4□9 Sim Road□ are concerned about the impact of the Project on the provision of access to properties in this section of Sim Road and re□uest the Project be relocated to the west, as addressed above.
- 37 The General Arrangement drawings show a median along this section of road and I e□pect that median could be a form that would prevent right turns. As noted earlier detour distances could be up to 2.4km.

Figure 11: Extract from General Arrangement drawings



- 3□ Submission 2□ is critical of the design as it does not provide future road connections for development and results in level differences between the roads and adjoining land. I do not support this submission point as the location of future road connections will be determined at a later time.

Management of □ffects

- 39 Submission 2□ □McLean Family Trust, □2□ Runciman Road□ re□uests the same relief for 2□DPL as re□uested for □DWA. I do not support that submission point.
- 40 Submission 27 □Ministry of □ducation, Mo□□notes there are a number of schools in the area near each of the projects as shown on a map in the submission and a few schools could be affected by construction of the 2□DPL Project. The submission re□uests amendments to the CTMP to include the Ministry and schools as a stakeholder, and to add references to educational facilities during pick up and drop off times. I support that submission.
- 4□ The Mo□ submission also re□uests several other additions or amendments to the wording of the CTMP condition for every Project to provide consistency with the CTMP conditions adopted for the Warkworth NoR and Airport to Botany NoR. I support that submission.

NOR 3: Paerata Connections

Submission Locations



- 42 The following figure shows the approximate location of transport□related submissions.

Figure 12: Approximate location of property-specific submissions



Alternate Routes, Alignment, Easements

- 4.43 Submission 1 Paerata Farms Ltd, 32 and 4 Sim Rd raises the same issues as for 2 DPL and I do not support those submission points.

Management of Effects

- 4.44 Submission 1 Ministry of Education requests changes to the CTMP as discussed above and I support that submission point.

NOR 4: Pukekohe North-East Arterial

Submission Locations



- 4.4 The following figure shows the approximate location of transport-related submissions.

Figure 13: Approximate location of property-specific submissions



Alternate Routes, Alignment, □□ents

- 4□ Submission 3 □Smith S, 70A and 70B Lisle Farm Drive□relates to a proposed private plan change where residential development is proposed to be located on both sides of the Pro□ect alignment and two new roads are proposed to connect to the Pro□ect. The submission supports the proposed alignment provided the route moves no further west within the site.

Design

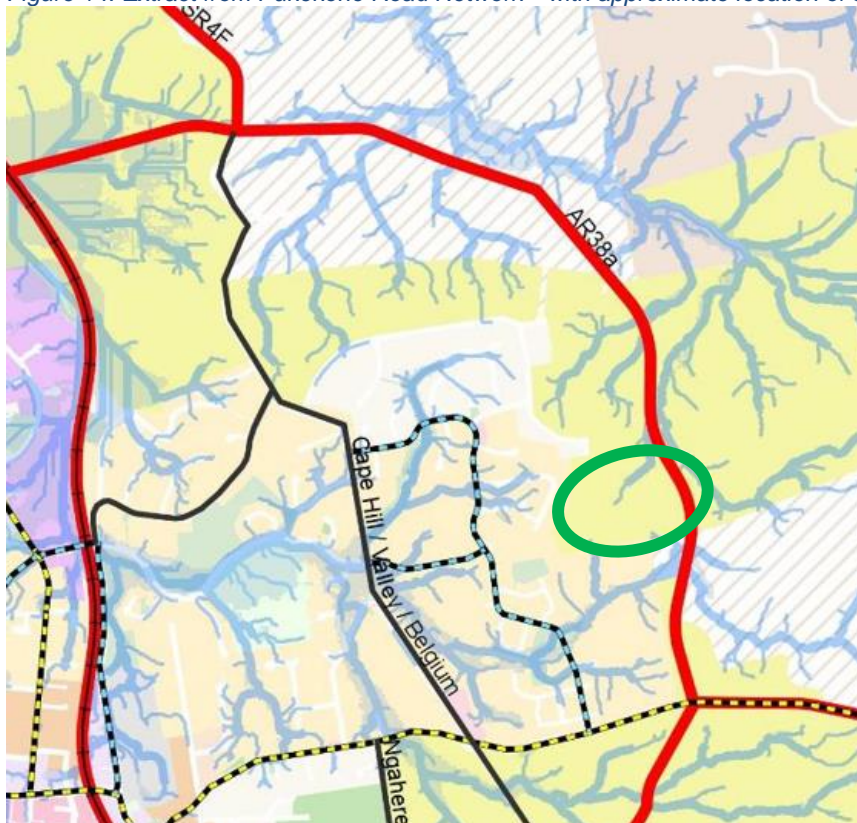
- 47 Submission 4 □Pukekohe Industrial Park and Storage Ltd, □□99 Paerata Road□re□uests that some of a proposed fill batter be substituted for a retaining wall to reduce the area of land re□uired in the long□erm. I re□uest the RA provide information on this matter at the hearing.

Property Access

- 4□ Submission □□Baptist G, □□73 Paerata Road□is concerned that safe access with a clear view is provided at the driveway of the property. The property is located on the west side of Paerata Road □SH22□between Heights Road and the MBB railway bridge, and the driveway is located on the inside of a bend a short distance south of Heights Road.
- 49 None of the Notices re□uire any part of that site and the General Arrangement drawings do not show any changes to Paerata Road near the driveway or other changes that might reduce the sight distances available at the driveway. For those reasons I do not support this submission.
- 0 Submission 3 re□uests at least one road connection is provided to the site described earlier and includes a concept of how the site may be developed. The development concept includes two side roads, one of which is a cul de sac providing access to □□ lots. The two side roads appear to be less than 70m apart.
- The AT□ e□plains that the general approach to providing road access to development areas is to have access between the Pro□ects and properties occur via collector roads. I understand the intention with respect to development areas is that the Pro□ect would only provide intersections with collector roads. That is consistent with best practice and I e□pect the collector road network would be broadly similar to that shown in the DOSP and PPSP. The only collector roads shown in the PPSP are e□isting, with the nearest being Anselmi Ridge Road, Lisle Farm Drive and Twomey Drive to the east.

□□

Figure 14: Extract from Pukekohe Road Network³⁵ with approximate location of submission 3 circled



- 2 I do not have sufficient vertical geometry information to determine if the proposed access roads would meet sight distance standards, or if right turn movements at one or both intersections would be feasible. Given the function of the Project and the volume of traffic likely to use the southern intersection I expect it would be undesirable for both intersections to have right turn movements. I expect it would not be possible to confirm the suitability of such access until the Project detailed design and OPW stage.
- 3 Based on the information currently available it may not be feasible or desirable to provide access to the western part of the submitters site directly from the Project. For those reasons I do not support this submission point.
- 4 Submission 4 (Pukekohe Industrial Park and Storage Ltd, □□99 Paerata Road) requests that an access be provided after construction in an agreed location. This land could be challenging to access once the Project is constructed and it may not be possible to provide an access agreeable to the property owner, so I do not support that submission point.
- Submission □3 (Connors M and C, □223 Paerata Road) raises a number of questions and concerns about various traffic matters, but no specific relief is requested. I consider the questions and concerns are addressed in the notified material and other hearing documentation.

Management of Effects

- Submission 4 also requests that fit for purpose access is provided during construction. I consider the conditions should provide appropriate access for every property as far as possible so I support that submission point.
- 7 Submission 9 (Ministry of Education) requests changes to the CTMP as discussed above and I support that submission point.

³⁵ Figure 6-8, Southern ITA

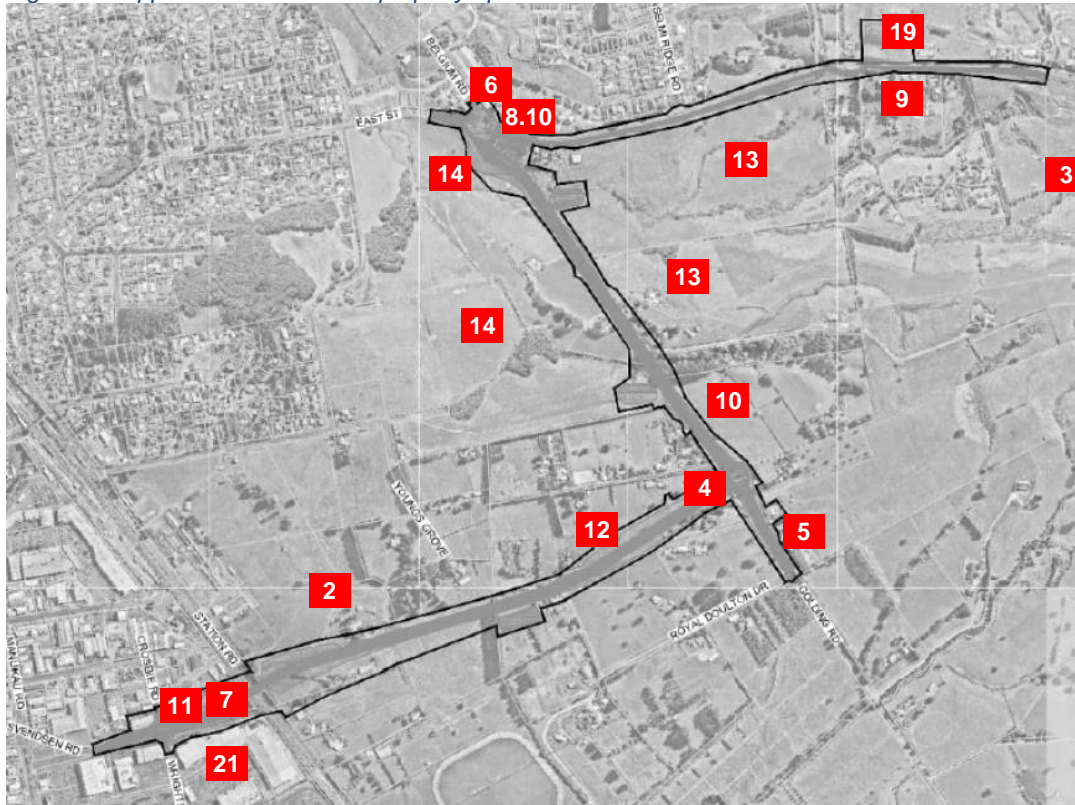
NOR5: Pukekohe South-East Arterial

Submission Locations

The following figure shows the approximate location of transport-related submissions.



Figure 15: Approximate location of property-specific submissions



Alternate Routes, Alignment, Contents

Pukekohe East Road

- 9 Submission 3 (Darou C, 40 Pukekohe East Road) contains views on 2 DPL that are addressed above, and on MP U that are addressed below. Submission 3 considers there is sufficient space within the existing road reserve to provide a footpath, and the m wide area proposed for the cycle and foot paths is excessive.
- 0 The typical cross-section diagram shows the corridor being 24m wide for sections with paths on both sides and this section with paths on one side. Lane and path widths are not shown, but it is common to include m separation between properties and a path, a footpath at least m wide, some separation between a footpath and a cycle path, around 3.m width for a two-way cycle path, and at least m separation between a path and traffic lanes, or around 3m separation if trees are to be planted. That would suggest a width in the order of 9m to 9.m would be consistent with current design guidelines and standards if trees are proposed. Additional width would be required for batter slopes or retaining walls.
- The dimensions above are the desirable dimensions for separated two-way paths on one side with tree planting. Given the road is proposed to have a 0km/h speed limit, I consider the minimum dimensions with a one-way cycle path and no tree planting could be as little as m plus allowance for earthworks, or as little as m if a shared path were used.
- 2 Dimensions smaller than those may also be practical. Two shared paths have been constructed as part of motorway widening works in recent years. The Southern Path runs along the western side of the Southern Motorway (SH) between Papakura and Takanini. The North Western Cycleway (SH) runs along the western side of the North Western Motorway between Lincoln Road and Westgate. Both of those paths are 3m wide bi-directional shared paths.

- 03 The panel may wish to consider if the 9.9m dimension proposed for paths and planting in this section is reasonably necessary, and I invite the RA to provide more information on this at the hearing. My preliminary recommendation is to support the submission points requesting the width of the corridor be reduced.
- 04 Submission 3 also considers the lack of a proposed path on the north side of the road is poor given the development at Anselmi Ridge, the opportunity to provide a viewing platform for the tuff ring and crater, the Pukekohe East Hall, tennis centre, and development along Runciman Road. Other submissions on MPU make the same request.
- 05 As noted above, the generic 24m wide road corridor used by the RA is capable of accommodating separate paths on both sides of the road, so it appears that paths along the northern side might be possible, although that would depend on the removal of the eastbound passing lane or the designation of additional property.
- 06 Submission 9 (Kennelly B, 9B Pukekohe East Road) expresses the view that the area of land is excessive and requests the boundary be altered to run along the top of an embankment. The area is adjacent to the proposed 4PN roundabout. Roundabout design guidelines include requirements for visibility at roundabouts, but the change proposed in the submission would not adversely affect that aspect of the design, and there is no apparent reason why the designation boundary could not be altered. As a result my pre-evidence recommendation is to support this submission.
- 07 Submission 3 (OMAC Limited and Next Generation Properties Limited, 47 Golding Road and 0 Pukekohe East Road) and Submission 4 (Aedifice Development No. 1 Limited, 2 and 9 Golding Road) support the 24m wide cross section but oppose the extent of land, particularly features beyond the 24m corridor.
- 08 The 24m cross-section is a generic diagram that might apply on straight level mid-block sections. Additional land may be required to provide for batters or retaining walls, on curves or at intersections, or to accommodate ancillary features such as stormwater ponds. Further land may also be required to facilitate construction. I do not support these reasons given in the submissions. Submissions 3 and 4 also consider the designation footprint could be reduced through the use of retaining walls instead of batters. I request the RA provide information on this at the hearing.
- 09 Submission 9 (Ainsley S, 7 Pukekohe East Rd) supports the current location of the roundabout at the PSA and 4PN roundabout intersection.
- 10 Submission 10 (TA Reynolds Holdings Ltd, 3 Pukekohe East Road) on NoR relates to land on the north-eastern corner of the Pukekohe East Road/Belgium Road/Golding Road East Street roundabout which is zoned Business – Neighbourhood Centre. The submission is concerned about the extent of land to be taken and the loss of two access points. The submission requests the roundabout be moved south.
- 11 Moving the roundabout to the south while maintaining acceptable roundabout geometry would require the realignment of East Street to the south and require more extensive fill batters on Golding Road. The land that would be affected by that change (Submitter 4) is zoned Rural Countryside Living and is currently in pasture.
- 12 Alternatively, it may be possible to control this intersection with traffic signals, although that may result in some detours caused by the proposed median on Golding Road to be longer. I recommend the RA provide additional information on the options available to reduce the impact on the BNC zoned land on the north-eastern corner of this intersection at the hearing.

New East-West Connection

- 13 Submissions 4 (Feng C, 04 Golding Road), 14 (DH and IM Mills Properties, 07 Golding Road) and 10 (Golding K, 97 Golding Road) are concerned about the proposed alignment of the roads and/or the roundabout proposed at the intersection of Golding Road and the new east-west connection.

- 0074 Submissions 0, 2 (Franklin Agricultural and Pastoral Society, 00 Station Road) 7 (enviro NZ Services, 00 Austen Place) 00 (Crosten Investments Ltd, 0 Austen Place and 02 and 02 Crosbie Road) 02 (Zheng S, 000A Golding Road) and 20 (Pukekohe Mega Trustees Ltd and Wrightson Way Ltd, 02000 Wrightson Way) raise concerns about the alignment and design of the new east-west section of the Project that passes over the NIMT railway to connect Golding Road with Svendsen Road.
- 0070 Submission 4 requests the alignment be relocated to reduce or avoid the impact on 004 Golding Road which is on the western side of Golding Road. Submission 0 requests the alignment move further west to reduce or avoid the impact on 007 Golding Road which is on the eastern side of Golding Road, opposite 004. Submission 00 requests traffic signals be used instead of a roundabout to avoid removal of a 000-year-old kauri tree.
- 0070 Relocating the Golding Road roundabout in any direction would appear to increase the impact of the Project on a number of other properties and dwellings, and there appear to be few alternatives that would impact fewer properties or dwellings, other than locating the roundabout and the east-west connection substantially further south.
- 0077 Using traffic signals instead of a roundabout is an option open to the RA in detailed design, although that would not provide for the shortest detours for vehicles no longer able to turn right at driveways. I do not support those submission points.
- 0070 Submissions 0 and 02 suggest the alignment should use part of the existing Royal Doulton Drive alignment to the south and pass over the NIMT railway at the same location, with Submission 02 noting that was the location shown in the PPSP. Submission 2 requests the road be moved south to reduce or avoid noise and vibration effects. Submission 7 requests the Notice be cancelled or modified so the Pukekohe Transfer Station Resource Recovery Centre site is not included as the site is the only waste transfer station in the area and would be difficult to replace. Submission 00 relating to adjoining land requests the route be located at Kitchener Road. Submission 20 requests the impacts on the Wrightson Way properties south of the transfer station be avoided or reduced and that both 0PS0A and 0PSWU be relocated to the north.
- 0079 The AOA describes the options considered that include six options considered in the 2009 Indicative Business Case, and then four options for each of two segments, with routes similar to the PPSP alignment recommended for further assessment³⁶. The route refinement process considered three options in each of three segments³⁷.
- 0000 One alignment was located north of the preferred alignment (S2002) and one was located partly along Royal Doulton Drive before passing to the north. All three options connected to Svendsen Road, and the AOA records “*limited differentiation in options*” for transport outcomes. The southern option (S2000) was discarded for topography and the likely impact on future urban development and Pukekohe Showgrounds. The northern option (S2003) was discarded for effects on a greater number of properties, the Pukekohe Showgrounds, and a stand of indigenous trees.
- 0000 I agree with the AOA in that there appears to be no strong traffic engineering reason to prefer one location or alignment over another east of the railway. For that reason, with respect to traffic engineering, I am neutral with respect to submission points relating to alignments east of the railway.
- 0002 Four options for connection points west of the railway were evaluated in the IBC process. The option connecting via Svendsen Road was recommended for refinement. The AOA states three routes between Svendsen Road and the railway were considered during route refinement, again with “*limited differentiation in options*” for transport outcomes.
- 0003 It appears the southern alignment (S3000) would have the least impact on the waste transfer station and the adjoining site (Submitters 7 and 000) and the greatest impact on Submitter 20.

³⁶ Pages 83-91, AOA.

³⁷ Pages 167-175, AOA.

The AOA records that option was discarded due to “significant property impacts including on a large commercial centre including the access”³⁸.

- 4 A location further south than S3□□ would likely be impractical unless a greater extent of Svendsen Road were to be realigned to the south, with a more significant impact on other properties. Any change in alignment would improve the outcome for some submitters and make the impact worse for others.
- Based on the information provided to date there appear to be sound traffic engineering reasons for selecting Svendsen Road as the western termination point for this route, and for the limited number of options assessed west of the railway. I agree with the AOA that there are few traffic-related reasons to prefer one of the three options over the other, but there are multiple property-related impacts from design choices, particularly the selection of batter slopes instead of retaining walls or a bridge structure supported by piers which may permit parking or vehicle manoeuvres beneath.
- It also appears there may be an option that grade-separates the new arterial and the Svendsen Road-Crosbie Road-Wrightson Way intersection by extending the bridge over the NIMT to also pass over that intersection before descending prior to the intersection with Manukau Road. That option would disconnect Svendsen Road from Crosbie Road and Wrightson Way and would likely result in access to properties along Svendsen Road being removed. That option may not be practicable or within scope.
- 7 My preliminary recommendation, subject to additional information about other alternatives, is to not support the submissions requesting alignments in significantly different locations, and neutral with respect to the selection of the preferred alignment out of the three options considered.
- I consider the assessment of alternatives at the alignment level to be appropriate—however, I recommend that additional consideration be given to using retaining walls or bridge structures instead of fill batters to reduce the impact on properties and request the RA provide more information on this at the hearing.

Property Access

- 9 Submissions □3 and □4 request that an intersection with traffic signals be provided at a planned collector road location. For reasons given above, I do not support those submission points.
- 90 Submission 2□ requests that the service lane and loading areas at its Wrightson Way properties continue to operate efficiently, safely, and effectively, both during construction and operation. I consider that the conditions should ensure that outcome for all affected properties as far as practicable, so support that submission point.

Management of Effects

- 9□ Submission □□ Ministry of Education requests changes to the CTMP as discussed above and I support that submission point.



NOR 6: Pukekohe South-West Upgrade

Submission Locations

- 92 The following figure shows the approximate location of transport-related submissions.

³⁸ Table 5-42, page 174, AOA.

Figure 16: Approximate location of property-specific submissions



Alternate Routes, Alignment, and Tents

- 93 Submissions 2 (Mayor G, Nelson Street), 3 (McIntyre and B, Ward Street) and 7 (Scott B, 99 Nelson Street) request the path is located on the opposite side of the road for various reasons, with Submission 3 also querying a proposed slip lane, requesting cyclists are diverted onto the road, and that the Ward Street/Queen Street/Nelson Street intersection be redesigned so additional land is not required.
- 94 The General Arrangement drawings do not show any changes to the geometry of the Ward Street/Queen Street/Nelson Street intersection, and no slip lane is proposed. Relocating the roundabout south would have adverse effects on properties on the south side of the road and is not supported. Replacing the roundabout with traffic signals is likely to be significantly less efficient unless additional lanes are provided which would probably require additional land.
- 95 Relocating the cycle path to the opposite side of the road would impact different properties in a similar way, so I am neutral with respect to traffic matters in relation to those submission points.
- 96 Submission 9 (Simpson R and Hickmont M, 10 Helvetia Road) requests that commercial and freight traffic should be routed along an alternate route to improve safety on Helvetia Road. I do not support that submission point.
- 97 Submission 3 (Pukekohe Mega Trustees Ltd and Wrightson Way Ltd, 2 Wrightson Way) opposes the route and considers it should be relocated to the north, together with PS/A. This request is addressed above and I do not support this submission point.

Design

- 98 Submission 1 (McMahon C and B, 99 Nelson Street) considers the existing berm width of 3.93 to 4.0m is more than adequate. I consider a berm width of 3.9m is sufficient to accommodate a shared path of say 3.0m width, but that would result in a less than desirable

separation between the path and passing vehicles, and insufficient space to accommodate features such as lamp posts and service plinths clear of the path.

- .99 A path width of 2.□m would be feasible but is only recommended for use where the number of cyclists and pedestrians are both relatively low (fewer than □0 pedestrians and fewer than □0 cyclists per hour³⁹). I expect the volumes on this route may be within the acceptable range for a narrower path, particularly for some shorter sections and invite the RA to provide more information on this at the hearing.
- .00 Submission □ also opposes alterations to the West Street□Harris Street□Helvetia Road roundabout and suggest the roundabout be shifted towards the southeast. The proposal does not involve changes to the roundabout geometry, and shifting the roundabout as required would involve substantial additional land and impact on other properties. I do not support this submission point.

Safety

- .0□ Submission □ (Cole K, □□7 Princes Street) requests further consideration for improving safety such as traffic calming (speed bumps) or reducing traffic flows past schools. This Project involves the introduction of an active mode path along one side of the road and is not proposing to make changes to intersections that I would expect to increase the volume or speed of traffic along this route. As a result I do not support this submission point.
- .02 Submissions 2, 3, and 9 are concerned about adverse safety effects where driveways cross the proposed active mode path. In my view the safety concerns about the proposed path crossing driveways are valid. As noted earlier I have significant safety concerns where cycle or shared paths are proposed in areas with frequent driveways, and the risks are exacerbated where cyclists can approach from both directions, and where the path is located close to the property boundary. For those reasons I support the submission points in relation to safety but do not support the other points in these submissions.

Parking

- .03 Submission 9 is concerned about the loss of berm space they rely on for parking. The berm is controlled by Auckland Transport and parking could be prohibited at any time so I do not support that submission point.

Management of Effects

- .04 Submission 7 is concerned about the loss of access during construction. I consider this is adequately addressed by the conditions.
- .0□ Submission □□ (Ministry of Education) requests changes to the CTMP as discussed above and I support that submission point.

NOR 7: Pukekohe North-West Arterial

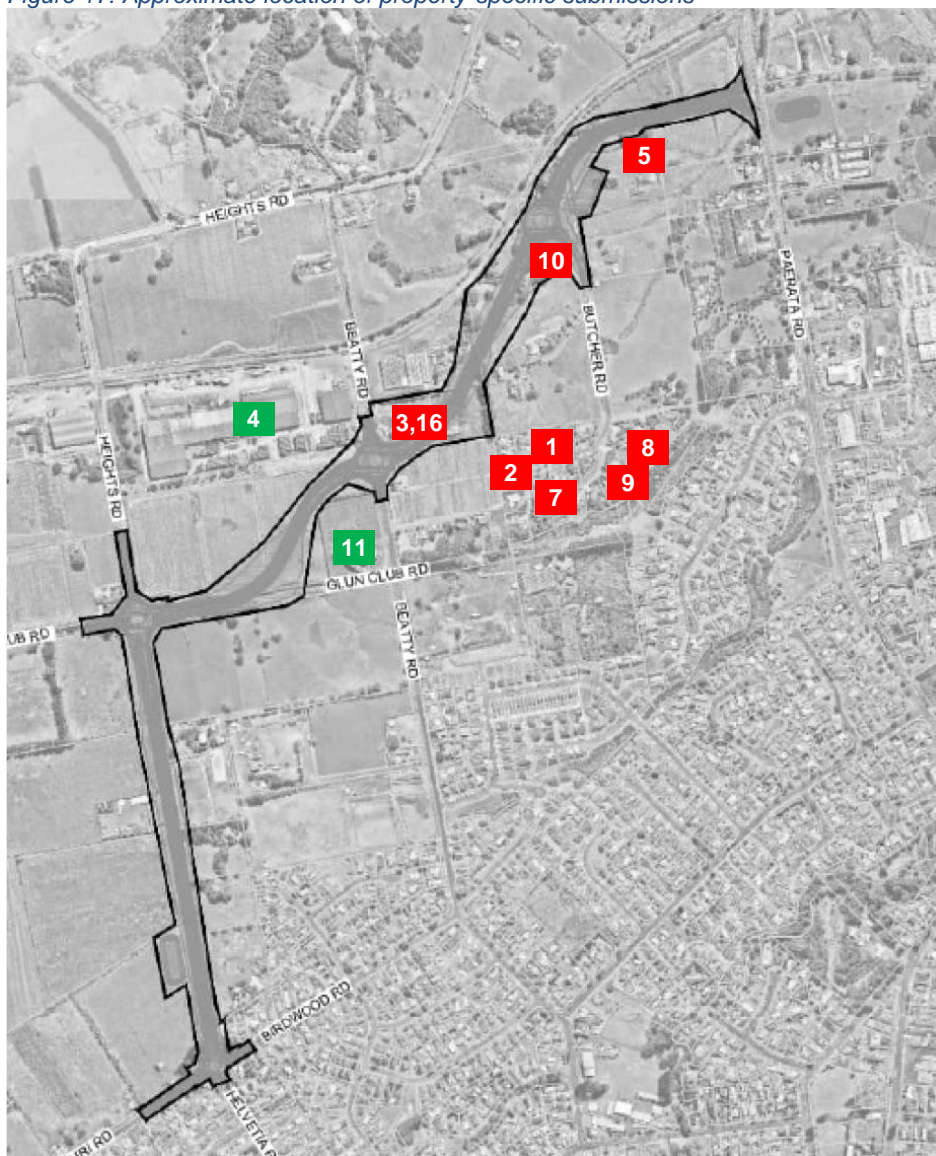


Submission Locations

- .0□ The following figure shows the approximate location of transport-related submissions.

³⁹ Section 5.1.3, Austroads Guide to Road Design Part 6A: Paths for Walking and Cycling, Austroads, 2016.

Figure 17: Approximate location of property-specific submissions



Alternate Routes, Alignment, and Comments

07 Submissions 4 Lawson S and P, 10 Butcher Road, 2 Whiteman L, 2 Butcher Road, 3 Cha S, 7 Beatty Road, 7 Telfer J, 10 Butcher Road, 1 Payne N, 97 Butcher Road, 9 Lynch C and A, 99 Butcher Road, 10 Polwart D and P, 3 and 2 Butcher Road, and 1 Kim S, 7 Beatty Road are of the view that Helvetia Road and Heights Road already provide a connection to SH22 in the northwest, and these roads should be upgraded instead of constructing a new road. Some submissions are of the view this option was not properly considered as an alternative.

08 The Assessment of Alternatives explains the earlier option assessment where four options, all using some part of Heights Road were considered⁴⁰. The more recent refinement and assessment process considered seven options in two segments with all but one option using part or all of Heights Road⁴¹. The preferred alignment was selected for a variety of reasons. I consider the assessment of alternatives is adequate at this scale so do not support these submission points.

09 Submission 1 Morrison D and L, 7, 7A Butcher Road request the active mode paths be located along the NZ Steel gas pipeline easement. The FirstGas pipeline is shown in Figure 11. There could be multiple issues associated with locating paths on that alignment including

⁴⁰ Pages 97-102, AOA.

⁴¹ Pages 180-187, AOA.

access to the pipeline for maintenance, severance of properties from fencing, lighting of the path, personal security issues and others. I do not support that submission point.

Figure 18: Gas Pipeline Location [data-firstgas.hub.arcgis.com]



- Submission 3 □Cha 7, □□7 Beatty Road□seeks that the boundary be modified so that only land essential for construction is purchased rather than the entire property. The reasons for requiring the entire property are not clear and I invite the RA to address this for the hearing.
- Submission □□ □Burns R, □□□ Beatty Road□requests the alignment is kept as far to the north □ west as possible to enable the house and surrounds to be retained. The proposed alignment appears to be consistent with this request.

Safety

- 2 Submission □ is concerned that the active mode paths on the northern side of the route would cross industrial driveways used by large and/or heavy vehicles, and that this would be unsafe. The land is currently zoned Future Urban. While the PPSP shows some of the land as Business – Light Industrial Zone and some as Residential, the actual zoning of the land, and appropriate means of accessing any development are yet to be determined. It is expected that access across the proposed active mode paths would be minimised, so I do not support this submission point.
- 3 Submission 9 is concerned the right turn out of Butcher Road would be unsafe. This intersection is proposed to be controlled by a roundabout so I do not support that submission point.

Property Access

- 4 Submission □□ requests access from the 7 □PNWA to both the north □western and south □ eastern portions of a property for future development. As noted earlier property access on these roads is undesirable, particularly where alternate road access is available, as would be the case here. I do not support this submission point.

Management of □ffects

- Submission □3 □Ministry of □ducation□requests changes to the CTMP as discussed above and I support that submission point.

NOR 8: Mill Road and Pukekohe East Road Upgrade - Auckland



Submission Locations

- The following figure shows the approximate location of transport □related submissions by Auckland Council. Submission □0 is addressed in □PS □A. Submission 9 is addressed with the Waikato submissions below.

Figure 19: Approximate location of property-specific submissions



Alternate Routes, Alignment, Comments

- 17.17 Submission 3 (Darou C and C, 40 Pukekohe East Road) was addressed in conjunction with PS A and is not supported.
- 17.18 Submission 1 (Twentyman D, 100 Pukekohe East Road) is of the view that vehicles should travel south via Pokeno or north via Drury instead of using Mill Rd, and requests alternatives of a route along the NIMT railway alignment through Pukekohe or that PS A be realigned to the south-east. I do not support those submission points.

Design

- 17.19 Submission 1 (Campaign for Better Transport) generally supports the Project. The submission expresses the view the kerbside lanes could be restricted to heavy goods vehicles (trucks) and/or higher occupancy vehicles, a T2 lane for example. I consider this to be an operational decision for the RA rather than being relevant to this decision, so do not support that submission point.

Property Access

- 17.20 Submissions 1 (van Schalkwyk A, 100 Mill Road) and 7 (Singh H, 100 C Mill Road) are both concerned about the access to these properties on the northern side of Mill Road. The common access to these properties is located approximately 100m west of the proposed roundabout at the eastern end of this project.
- 17.21 The submitters are unclear on the intention for the median and requests the provision of safe access noting that there is currently a high perceived risk of collision when turning right into this driveway. The AT recommends that right turn property access in the four-lane section be restricted for safety reasons and states it is proposed *“that all accesses along this section to be changed to left-in and left-out on, with right turn movements prohibited.”*⁴²
- 17.22 I therefore expect that right turn movements into this property would instead need to detour to U-turn around the Harrisville Road roundabout about 1.3km away, an additional journey distance of 3.3km. Right turn movements out of the property would instead need to turn left and then U-turn around the new roundabout about 100m away, an additional journey length of 300m. I expect the crash risk associated with the new movements to be significantly less than the current right-turn movements. In my view the Project provides safe access and satisfies the submission request.

- 17.23 Submissions 4 (Maimere Properties, 97 Pukekohe East Road) and 1 (Johnstone M and L and Williams, 97 Pukekohe East Road) request the property access is relocated to provide safe access, and that the speed limit be lowered. The Project is not proposing changes to the geometry of the traffic lanes. Changes to speed limits are made through a different process, and the property owner could pursue a safer access location at any time. I do not support either submission point.

Management of Effects

- 17.24 Submission 4 (Ministry of Education) requests changes to the CTMP as discussed above and I support that submission point.

⁴² Pg 71, ATE

NOR 8: Mill Road and Pukekohe East Road Upgrade - Waikato

Submission Locations



- 2□ The following figure shows the approximate location of transport-related submissions relating to properties in Waikato.

Figure 20: Approximate location of property-specific submissions



General

- 2□ Submission 3 (Waikato District Council Roading Team) supports the Project as it supports safety and connectivity. The submission requests the roundabout at the Pukekohe East Road/Mill Road/Harrisville Road intersection is prioritised. While this is an intersection that can experience longer delays and has a poor crash record the prioritisation of projects or parts of projects is outside the scope of this process so I am unable to support that submission point.

Alternate Routes, Alignment, Contents

- 27 Submission (Lawrie D and L, 2B Mill Road) consider separate pedestrian and cycle paths are excessive and request the width of the designation be reduced. Submissions 9 (Muir □, □□ Mill Road) and □0 (Muir L, □□ Mill Road) request the walking and cycling paths be combined and relocated to the north side of the road. Submission 4 (Roose A and K) is neutral but queries the amount of land taken.
- 2□ The AT□ has a cross-section diagram showing separate bi-directional paths on one side of the road and says the exact provision will be determined at the time of detailed design. The General Arrangement drawing shows a non-specific path 4.0m wide.
- 29 In my view shared active mode paths are most appropriate when the volume of pedestrians and/or cyclists is low, and where the speed of cyclists is lower. Separated paths are most appropriate where the speed or volume of users is higher. Paths catering for two directions of cycle travel would desirably be wider, particularly where volumes or speeds are higher.
- 30 I would expect the volume of both pedestrians and cyclists on this route to be relatively low in comparison to other routes. Given the longer distances and alignment cyclists speeds may be relatively high in some locations however, I expect cyclist speeds would be no higher than on the paths recently constructed along the Southern Motorway and North-Western Motorway. Both of those paths are 3m wide bi-directional shared paths, which is significantly narrower than the 4.0m width proposed here. I invite the RA to provide more information on this matter at the hearing. My preliminary recommendation is to support the submission points requesting a narrower combined path.
- 3□ The matter of shifting the path to the north side are addressed with the □PS□A submissions.
- 32 Submission 2 (Whitley A, 2□0 Pukekohe East Road) considers the area of land required for earthworks batters could be reduced if the adjoining gully on this property was filled. The submission requests consent to fill the gully which cannot be addressed in this process so I am unable to support this submission.

Property Access

- 33 Submission Auckland 9 (Cunningham R, □0 Mill Road) requests that some form of traffic management system is installed at the roundabouts to provide for free-flowing U-turns at the

□□

roundabouts to offset the additional travel time imposed by the median removing right turn movements at driveways. I do not know of any suitable system and do not support this submission point.

- 2.34 Submission 7 (Crane A, 24 Pukekohe East Road) requests the notice be declined for reasons including the “current roadside area has been used to safely turn around when entering and exiting the property via vehicle”. From inspection I take the roadside area in question to be a large “vehicle crossing” serving two driveways and located within the road reserve. As this is a relatively large lot I consider there should be sufficient space to develop an on-site turning area if desired and do not support this submission point.

Requested Amendments to Conditions

- 2.35 Some submitters have requested specific amendments to particular conditions, additional conditions, or have requested general amendments to achieve a particular outcome. Those relevant to transport matters are considered below.
- 2.36 The MoU submissions 2.27, 4.9, 4.10, 4.11, 7.3 and A.4 request specific amendments to the conditions including amendments to provide consistency with conditions on other projects including the Warkworth NORs and Airport to Botany Bus Rapid Transit NORs, and to address construction traffic near schools.
- 2.37 I support these submission points where relevant to transport matters, and particularly the CTMP. I have adopted the MoU amendments in my recommended changes to the conditions below, except for the requested addition of clauses 4.10 to 4.11 as the notified conditions already include those clauses.

12 Proposed Conditions

- 2.1 The conditions proposed by the RAs are appended to the Form 224 notices. There is one set of conditions for the NZTA Projects (2.1 DPL and 2.1 MP/U) and one set for the AT Projects.

Auckland Transport Projects

- 2.2 These conditions apply to 2.1 DWA, 3.1 PC, 4.1 PNA, 4.1 PSA, 4.1 PSWU and 7.1 PNWA.

Existing Property Access

- 2.3 Condition 2.3 Existing property access applies to all Projects. As proposed the condition requires consultation and requires the Outline Plan to demonstrate how safe access will be provided.
- 2.4 As proposed the condition wording could result in an access that may not provide for movement of all vehicles used on that property, such as large truck and trailer vehicles or agricultural machinery. I consider the condition should be amended to require the access to be fit for purpose or adequate.
- 2.5 I also consider that it would be desirable for the replacement or altered access to be reasonable efficient, particularly with respect to additional journey length and time. I acknowledge it may be difficult to provide wording that does not rely on subjective assessment, but in that regard the term “safe” is also inherently subjective.
- 2.6 Relevant submissions include 4.4, 2.2, and 2.3.
- 2.7 As noted earlier, the ATU recommends that a Site-Specific Traffic Management Plan (SSTMP) be provided to address access to properties, if required. No condition requires a SSTMP however, the CTMP is required to include methods to provide access, and a SSTMP is one method that could be used.

- 2.□ I recommend the wording of this condition be amended as follows [the submission numbers in brackets are not intended to form part of the condition]

13. Existing property access

Prior to submission of the Outline Plan, consultation shall be undertaken with landowners and occupiers whose vehicle access to their property will be altered by the project. The Outline Plan shall demonstrate how safe, **adequate, and efficient** ^[4.4, 5.21, 6.13] reconfigured or alternate access will be provided, unless otherwise agreed with the landowner.

Construction Traffic Management Plan

- 2.9 All AT Project Outline Plans are required to include a Construction Traffic Management Plan (CTMP) via Condition □, and the requirements for CTMPs are set out in Condition □7.
- 2.□0 In my view the stated objective of the management plan is appropriate.
- 2.□□ The equivalent condition for the two NZTA Projects has the same wording but in a slightly different structure. In the NZTA version condition □ relating to monitoring is included as condition □ which I prefer as this relates to auditing, monitoring and reporting requirements which should apply to the CTMP rather than being a matter to be included.
- 2.□2 I recommend the following changes, based on the notified conditions. I have included the changes requested in the MoE submissions except where noted above.

17. Construction Traffic Management Plan (CTMP)

- (a) A CTMP shall be prepared prior to the Start of Construction for a Stage of Work. The objective of the CTMP is to avoid, remedy or mitigate, as far as practicable, adverse construction traffic effects. To achieve this objective, the CTMP shall include:
- (i) methods to manage the effects of temporary traffic management activities on traffic;
 - (ii) measures to ensure the safety of all transport users;
 - (iii) the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours **(for example on roads servicing educational facilities during pick up and drop off times)** ^[MoE] to manage vehicular and pedestrian traffic near **educational facilities schools** ^[MoE] or to manage traffic congestion;
 - (iv) site access routes and access points for heavy vehicles, the size and location of parking areas for plant, construction vehicles and the vehicles of workers and visitors;
 - (v) identification of detour routes and other methods to ensure the safe management and maintenance of traffic flows, including **public transport service**, ^[MoE] pedestrians and cyclists, **on existing roads** ^[MoE];
 - (vi) methods to maintain **vehicle** ^[MoE] access to **and within** ^[MoE] property and/or private roads **for all transport modes** ^[MoE] where practicable, or to provide alternative access arrangements when it will not be;
 - (vii) the management approach to loads on heavy vehicles, including covering loads of fine material, the use of wheel-wash facilities at site exit points and the timely removal of any material deposited or spilled on public roads;

(viii) methods that will be undertaken to communicate traffic management measures to affected road users (e.g. residents/_public/_stakeholders/ emergency services);

~~(ix) auditing, monitoring and reporting requirements relating to traffic management activities shall be undertaken in accordance with the New Zealand Guide to Temporary Traffic Management or any subsequent version;~~ [consistency with NZTA conditions]

(ix) details of minimum network performance parameters during the construction phase, including any measures to monitor compliance with the performance parameters; and

(xi) details of any measures proposed to be implemented in the event of thresholds identified in (x) being exceeded.

(b) auditing, monitoring and reporting requirements relating to traffic management activities shall be undertaken in accordance with the New Zealand Guide to Temporary Traffic Management or any subsequent version; [consistency with NZTA conditions]

2.3 The list of matters includes a reference to the “New Zealand Guide to Temporary Traffic Management or any subsequent version”. It is possible that a different document could supersede that guide, rather than it being a later version of the same document, and a minor amendment to this wording could provide for that possibility, although no submission point requests that amendment.

(b) auditing, monitoring and reporting requirements relating to traffic management activities shall be undertaken in accordance with the New Zealand Guide to Temporary Traffic Management or any **subsequent version replacement;**

Waka Kotahi New Zealand Transport Agency Transport Projects

2.4 These conditions apply to 2DPL and MP.

Existing Property Access

2.5 Condition 2 Existing property access applies to both Projects. As proposed the condition requires consultation and requires the Outline Plan to demonstrate how safe access will be provided.

2.6 I recommend the wording of this condition be amended to be the same as AT Condition 3 as described above for consistency, although no submission point requested that specific relief for the NZTA Projects.

Construction Traffic Management Plan

2.7 Both NZTA Project Outline Plans are required to include a Construction Traffic Management Plan (CTMP) and the requirements for CTMPs are set out in Condition 4.

2.8 In my view the stated objective of the management plan is appropriate. I recommend the same changes I recommended for the AT conditions.

2.9

17. Construction Traffic Management Plan (CTMP)

(a) A CTMP shall be prepared prior to the Start of Construction for a Stage of Work. The objective of the CTMP is to avoid, remedy or mitigate, as far as practicable,

adverse construction traffic effects. To achieve this objective, the CTMP shall include:

- (i) methods to manage the effects of temporary traffic management activities on traffic;
 - (ii) measures to ensure the safety of all transport users;
 - (iii) the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours **(for example on roads servicing educational facilities during pick up and drop off times)** ^[MoE] to manage vehicular and pedestrian traffic near **educational facilities schools** ^[MoE] or to manage traffic congestion;
 - (iv) site access routes and access points for heavy vehicles, the size and location of parking areas for plant, construction vehicles and the vehicles of workers and visitors;
 - (v) identification of detour routes and other methods to ensure the safe management and maintenance of traffic flows, including **public transport service**, ^[MoE] pedestrians and cyclists, **on existing roads** ^[MoE];
 - (vi) methods to maintain **vehicle** ^[MoE] access to **and within** ^[MoE] property and/or private roads **for all transport modes** ^[MoE] where practicable, or to provide alternative access arrangements when it will not be;
 - (vii) the management approach to loads on heavy vehicles, including covering loads of fine material, the use of wheel-wash facilities at site exit points and the timely removal of any material deposited or spilled on public roads;
 - (viii) methods that will be undertaken to communicate traffic management measures to affected road users (e.g. residents/_public/_stakeholders/ emergency services);
 - (ix) details of minimum network performance parameters during the construction phase, including any measures to monitor compliance with the performance parameters; and
 - (x) details of any measures proposed to be implemented in the event of thresholds identified in (x) being exceeded.
- (b) auditing, monitoring and reporting requirements relating to traffic management activities shall be undertaken in accordance with the New Zealand Guide to Temporary Traffic Management or any **subsequent version replacement**;

13 Conclusions and Recommendations

Areas of Concern

- 3.1 I have significant concerns in relation to cyclist safety on the proposed PSWU shared path as that is a bi-directional path in an urban area with a high number of driveways and the path is relatively close to the property boundary.
- 3.2 I have moderate concerns about detours and U-turn movements caused by the introduction of medians that prevent right turns at driveways and side roads in the event that some of the intersections proposed to be controlled by roundabouts are instead constructed in some other form.

- 3.3 I have moderate concerns that an appropriate range of alternate methods have not been considered for reducing the impact on some properties. These include options for dealing with height differences including embankments, retaining walls and other structures. These also include combining separate active mode paths into shared paths and reducing the width of roadside features to less than ideal widths.

Additional Information

- 3.4 I recommend that additional information be provided for the hearing in relation to
- a Safety in relation to the conflicts between shared path users (predominantly cyclists) at driveways where the path is located close to the property boundary and visibility between cyclists and drivers may not be sufficient to provide satisfactory stopping distances. This should include all Projects in general, and PSWU in particular.
 - b How detours and U-turn manoeuvres generated by the removal of right turns at driveways and side roads could be safely and efficiently managed in the event some of the intersections proposed to be controlled by roundabouts are constructed with an alternate form.
 - c How detours U-turn movements on Pukekohe East Road west of Harrisville Road could be safely and efficiently managed, including a safety assessment of U-turns occurring in a variety of locations including Runciman Road.
 - d The necessity of including active mode facilities on all sections of 2 DPL given the regional AMC and active mode facilities on SH22 would run broadly parallel a relatively short distance away.
 - e Options for realigning the Paerata Arterial Segment of 2 DPL between Sim Road and the NIMT railway.
 - f Options for reducing the extent of the designation and the impact on the following properties including substituting retaining walls or other structures for embankments
 - i 4 PN A 99 Paerata Road
 - ii PS A properties west of the NIMT, 2, 9, and 47 Golding Road and Pukekohe East Road
 - g Refinement of the designation boundaries at
 - i PS A 3 Pukekohe East Road and 9 B Pukekohe East Road
 - ii 7 PN A 7 Beatty Road
 - h Options for reducing the extent of the designation and the impact on properties by providing a shared path instead of separate active mode paths and/or reducing the width of the paths and other roadside features, particularly on PS A, PSWU and MP U.

Planning Framework

3. In my view the projects are consistent with, support, and give effect to the relevant National Policy Statements, and the Auckland Unitary Plan including the Regional Policy Statement. The projects are consistent with, support, and give effect to other relevant documents including the Auckland Plan, Climate Plan, and Draft Future Development Strategy, with the exception of PSWU.
3. In my view there are no additional management methods that could ensure greater consistency with the higher order planning documents.

Adequacy of Assessment of Transport Effects

- 3.7 The Assessment of Transport Effects (ATE) has evaluated the adverse and beneficial effects of the Projects based on all Projects being implemented in full. This approach has some limitations
 - a□ It does not consider a possible outcome where some projects, or some stages of some projects are not implemented□
 - b□ It does not allow for the effects of each individual project to be evaluated separately.
- 3.8 The ATE assessment has also evaluated the effects by assuming that all planned growth would occur with or without the Projects. This approach does not align well with development in the growth areas being conditional on some of the Projects being implemented as required by the FDS. As a result, the beneficial transport effects of the Projects may be overstated.
- 3.9 The ATE assessment also assumes that no other significant projects, such as works to improve safety on existing routes would occur in the absence of these projects, and that may also result in the safety benefits of the Projects being overstated.
- 3.10 I consider it would have been onerous for the ATE to have assessed the effects of each stage of each Project individually, and unduly onerous for the assessment to have considered every logical combination of various project stages□however it would have been desirable for some of the Projects which are more independent of the others to have been assessed separately.
- 3.11 It would have also been possible for the ATE assessment to have excluded development in growth areas that are dependent on a Project being implemented□however it is acknowledged that those dependencies have only recently been established in the new FDS.
- 3.12 I consider the assessment of effects on road safety with respect to PSWU does not adequately consider the risk of crash and injury where the proposed active mode path intersects with multiple and frequent driveways.
- 3.13 I consider the assessment of transport effects to be adequate for the other Projects.

Adequacy of Assessment of Alternatives

- 3.14 The AOA has outlined the extensive process that has been undertaken to consider, prioritise, and select the proposed overall type of Project, the alignment of each Project, and the general design parameters of each Project.
- 3.15 The assessment of alternatives undertaken to date has considered the Projects at a sub-regional level and has considered some more localised issues such as the presence of particular environmental features. It is possible that further investigation and design work may uncover currently unknown issues, and that may require some further consideration of alternative means and methods of undertaking the work.
- 3.16 There are some locations where alternative alignments requested by submitters have apparently not been considered in the assessment of alternatives to date. It is possible that these alternatives were considered in earlier work and discarded without being documented. It would be useful to have additional information on these alternatives provided for the hearing, but my preliminary view based on a RA not having to have investigated every alternative is that the assessment of alternate routes and alignments is sufficient.
- 3.17 The assessment of alternatives has not considered alternative means and methods at a localised per-property level. Considering alternative methods such as choosing between an embankment or a retaining wall is likely to occur during the detailed design stage and in consultation with affected property owners□however, in some cases that decision has a significant impact on effects and I recommend that additional consideration be given to alternate methods of undertaking the work for some submitter properties as described above.

- 3.1 Overall I consider the assessment of alternatives is adequate for the stated purpose and objectives at the macro scale, but that further consideration is warranted for some individual properties.

Necessity

- 3.19 I consider each of the Projects, or at the very least substantially similar projects, are necessary in order to provide for the planned growth that is forecast to occur. I am therefore satisfied that at a macro level in relation to transport matters that the Projects are reasonably necessary, with the exception of PSWU in the form proposed.
- 3.20 As noted above, the assessment of alternatives means and methods has not yet been undertaken at the micro per-property level or considered detailed design choices such as the use of an embankment or a retaining wall at each individual cut or fill site. As a result, I cannot confirm that the proposed extents of the designation on each individual property are reasonably necessary with respect to some properties in the absence of additional information.
- 3.21 In relation to overall transport matters I consider the Projects as a whole are reasonably necessary, with the exception of PSWU and with respect to the extent of land required in some specific instances.

Recommendations

- 3.22 The following recommendations are preliminary prior to the receipt of evidence including any items of additional information listed above.
- 3.23 I support 1 Drury West Arterial with amendments to the conditions relating to existing property access, and the conditions specifying CTMP requirements.
- 3.24 I provisionally support 2 Drury Pukekohe Link with amendments to the conditions relating to existing property access, and the conditions specifying CTMP requirements, subject to further information and consideration of alternative alignments for the Paerata Arterial section.
- 3.25 I support 3 Paerata Connections with amendments to the conditions relating to existing property access, and the conditions specifying CTMP requirements
- 3.26 I provisionally support 4 Pukekohe North East Arterial with amendments to the conditions relating to existing property access, and the conditions specifying CTMP requirements, subject to further refinement of the design and assessment of alternative methods to reduce the impact on properties including retaining walls or bridge structures instead of embankments, particularly at 99 Paerata Road.
- 3.27 I provisionally support 5 Pukekohe South East Arterial with amendments to the conditions relating to existing property access, and the conditions specifying CTMP requirements, subject to further refinement of the design and assessment of alternative methods to reduce the impact on properties including
- a the use of retaining walls or bridge structures instead of embankments, particularly for properties west of the NIMT, 2, 9, and 47 Golding Road and 10 Pukekohe East Road
 - b refinement of the designation boundary at 3 Pukekohe East Road
 - c refinement of the designation boundary at 9B Pukekohe East Road
 - d the provision of one shared active mode path rather than separate paths and the reduction in width of the path and other roadside features.
- 3.28 Provisionally, I do not support 6 Pukekohe South West Upgrade on the grounds of adverse effects on cyclist safety which is contrary to the stated purpose of the Project. In the event

that this Project is supported by the panel I recommend amendments to the conditions as for the other Projects.

- 3.29 I provisionally support 7 Pukekohe North West Arterial with amendments to the conditions relating to existing property access, and the conditions specifying CTMP requirements, subject to further information about the extent of land required at 7 Beatty Road.
- 3.30 I provisionally support Mill Road and Pukekohe East Road Upgrade in Auckland and in Waikato with amendments to the conditions relating to existing property access, and the conditions specifying CTMP requirements, subject to
 - a further refinement of the design and assessment of alternative methods to reduce the impact on properties including the provision of one shared active mode path rather than separate paths, and the reduction in width of the path and other roadside features
 - b further consideration of the safety and efficacy of right turn movements displaced by any median for properties west of Harrisville Road.

Appendix A: Glossary of Terms and Abbreviations

Term	Description
1:DWA	Project 1: Drury West Arterial
2:DPL	Project 2: Drury-Paerata Link
3:PC	Project 3: Paerata Connections
4:PNEA	Project 4: Pukekohe North-East Arterial
5:PSEA	Project 5: Pukekohe South-East Arterial
6:PSWU	Project 6: Pukekohe South-West Upgrade
7:PNWA	Project 7: Pukekohe North-West Arterial
8:MPEU	Project 8: Mill Road and Pukekohe East Road Upgrade
AC	Auckland Council
Active Mode	Non-motorised means of transport including walking, cycling, scooting, skateboarding
AEE	Assessment of Environmental Effects prepared by SGA
AFC	Auckland Forecasting Centre, an AC, AT and NZTA partnership that operates transport models
AMC	Active Mode Corridor
AOA	Assessment of Alternatives prepared by SGA
AT	Auckland Transport
ATE	Assessment of Transport Effects prepared by SGA
AUP	Auckland Unitary Plan (Operative in Part)
CTMP	Construction Traffic Management Plan – a document that manages traffic during construction, will include a number of TTMPs
DBC	Detailed Business Case
DOSP	Drury-Opāheke Structure Plan
DSI	Death and Serious Injury road crashes
ERP	Emissions Reduction Plan
FDS	Auckland Future Development Strategy (2023)
FTN	Frequent Transit Network – public transport services running frequently, usually buses in bus lanes
FULSS	Auckland Future Land Supply Strategy (2017) superseded by FDS
FUZ	Future Urban Land – a zoning applied to land expected to be rezoned for future development
GPS-LT	Government Policy Statement – Land Transport
IBC	Indicative Business Case
ITA	Integrated Transport Assessment
LAR	Limited Access Road
LCSIA	Level Crossing Safety Impact Assessment
MBB	Mission Bush Branch railway
MDRS	Medium Density Residential Standards – a government initiative to increase housing provision
MSM	Macro Strategic Model – a transport demand software model of the Auckland Region
MoE	Ministry of Education
NIMT	North Island Main Trunk railway
NOR	Notice of Requirement
NPS-UD	National Policy Statement – Urban Development, a policy that planning decisions must give effect to
NZTA	Waka Kotahi New Zealand Transport Agency
OPW	Outline Plan of Works – plans provided by the RA to the Councils prior to commencing work
PC	Plan Change – a process to change a Unitary or District Plan, usually to rezone land
PC78	An Auckland Council Plan Change to implement the MDRS and related requirements
PPSP	Pukekohe-Paerata Structure Plan
PT	Public Transport
RA	Requiring Authority
RCA	Road Controlling Authority
RPS	Regional Policy Statement – a regional statement that planning decisions must give effect to
RTN	Rapid Transit Network – public transport services running frequently on a dedicated way, includes passenger rail services and North Shore Busway
SGA	Te Tupu Ngātahi Supporting Growth Alliance
SH1	State Highway 1, Southern Motorway and Waikato Expressway
SH22	State Highway 22, Paerata Road and Karaka Road
TERP	Auckland's Transport Emissions Reduction Plan – a document planning decisions must have regard to
TTMP	Temporary Traffic Management Plan – a plan and drawings for the temporary management of traffic (may include hours of work, road closures and detours, temporary speed limits, the location of signs and cones), to be approved by the RCA.
VKT	Vehicle Kilometres Travelled – a measure of vehicle travel on roads
WDC	Waikato District Council

Appendix B: Summary of Recommended Response to Submissions

1: Drury West Arterial

Submission	Submitter	Response
1	Telecommunications Submitters	Not transport related
2	Fisher and Paykel Healthcare	Supported in part
3	KiwiRail Holdings	Not transport related
4	McKean Family Trust	Not supported
5	Watercare Services Ltd	Not transport related
6	Ministry of Education	Neutral
7	Counties Energy Ltd	Not transport related
8	The Campaign for Better Transport Inc	Supported in part

2: Drury-Pukekohe Link

Submission	Submitter	Response
1	Harrison L and Ah-Wong E	Not supported
2	Owers S	Not supported
3	Beaurain R	More information required
4	Beaurain BJ	More information required
5	Telecommunications Submitters	Not supported
6	Joyce C	Not supported
7	Ro M	Not supported
8	Postles B and L	More information required
9	Ruddell J	Not supported
10	Brown T	Not supported
11	Farley R	Unclear
12	McCall G	More information required
13	Carpenter D and S	More information required
14	XLU	Not supported
15	Dane M	Not transport related
16	Berry R	More information required
17	Fisher and Paykel Healthcare	Not supported
18	D and K Sim Ltd	Not supported
19	Trevlyn Enterprises	Not supported
20	Sim P	Not supported
21	Roding and Asphalt Ltd	Not supported
22	Public Works Advisory Ltd	Not transport related
23	Thompson J	Not supported
24	KiwiRail Holdings	Not transport related
25	McKean Family Trust	Not supported
26	Watercare Services Ltd	Not transport related
27	Ministry of Education	Supported
28	Paerata 5 Farms Ltd	More information required
29	Counties Energy Ltd	Not transport related
30	The Campaign for Better Transport Inc	Neutral
31	Haddad P	Not supported
32	Ross H	Not supported

3: Paerata Connections

Submission	Submitter	Response
1	Telecommunications Submitters	Not transport related
2	YWMP Ltd	Not transport related
3	KiwiRail Holdings	Not transport related
4	Watercare Services Ltd	Not transport related
5	Ministry of Education	Supported
6	Paerata 5 Farms Ltd	Not supported
7	Counties Energy Ltd	Not transport related
8	The Campaign for Better Transport Inc	Neutral

4: Pukekohe North-East Arterial

Submission	Submitter	Response
1	Baptist G	Not supported
2	Telecommunications Submitters	Not transport related
3	Smith S	Neutral
4	Pukekohe Industrial Park and Storage Ltd	More information required Not Supported
5	Heritage NZ	Not transport related
6	Burgoyne S	Not transport related
7	KiwiRail Holdings	Not transport related
8	Watercare Services Ltd	Not transport related
9	Ministry of Education	Supported
10	Ainsley S	Not transport related
11	Counties Energy Ltd	Not transport related
12	The Campaign for Better Transport Inc	Neutral
13	Connors M and C	Neutral

5: Pukekohe South-East Arterial

Submission	Submitter	Response
1	Holy Properties Ltd	Not transport related
2	Franklin A & P Soc	Not supported
3	Daroux C and C	Supported in part (preliminary)
4	Feng C	More information required
5	DH and IM Mills Properties	More information required
6	Telecommunications Submitters	Not transport related
7	Enviro NZ Services	More information required
8	Chen X	Not transport related
9	Kennelly B	Supported (preliminary)
10	Golding K	More information required
11	Crosten Investments Ltd	More information required
12	Zheng S	Not supported
13	OMAC Limited and Next Generation Properties Limited	Not supported
14	Aedifice Development No.1 Limited	Not supported
15	KiwiRail Holdings	Not transport related
16	The Campaign for Better Transport Inc	Neutral
17	Watercare Services Ltd	Not transport related
18	Ministry of Education	Supported
19	Ainsley S	Not transport related
20	Counties Energy Ltd	Not transport related
21	Pukekohe Mega Trustees Limited and Wrightson Way Limited	More information required Supported in part

6: Pukekohe South-West Upgrade

Submission	Submitter	Response
1	Cole K	Not supported
2	Mayor G	Supported in part
3	McIntyre E and B	Supported in part
4	Baker J	Not transport related
5	Telecommunications Submitters	Not transport related
6	McMahon C and B	More information required Not supported
7	Scott B and Farrer P	Neutral
8	Heritage NZ	Not transport related
9	Simpson R and Hickmont M	Supported in part
10	Watercare Services Ltd	Not transport related
11	Ministry of Education	Supported
12	Counties Energy Ltd	Not transport related
13	Pukekohe Mega Trustees Limited and Wrightson Way Limited	Not supported
14	The Campaign for Better Transport Inc	Not supported

7: Pukekohe North-West Arterial

Submission	Submitter	Response
1	Lawson S and P	Not supported
2	Whiteman L	Not supported
3	Cha S	Not supported More information required
4	Balle Bros Fresh Produce	Supported
5	Morrison D and L	Not supported
6	Telecommunications Submitters	Not transport related
7	Telfer J	Not supported
8	Payne N	Not supported
9	Lynch C and A	Not supported
10	Polwart D and P	Not supported
11	Burns R	Neutral
12	Watercare Services Ltd	Not transport related
13	Ministry of Education	Supported
14	Counties Energy Ltd	Not transport related
15	The Campaign for Better Transport Inc	Neutral
16	Kim S	Not supported More information required

8: Mill Road - Pukekohe East Road Upgrade - Auckland

Submission	Submitter	Response
1	van Schalkwyk A	Neutral
2	AMJG Investment	Unclear
3	Daroux C and C	Not supported
4	Maimere Properties	Not supported
5	Johnstone M and L and Williams L	Not supported
6	Telecommunications Submitters	Not supported
7	Jeon C	Unclear
8	Twentyman D	Not supported
9	Cunningham R	Not supported
10	TA Reynolds Holdings Ltd	Supported in part (preliminary)
11	Heritage NZ	Not transport related
12	FirstGas Ltd	Not transport related
13	Watercare Services Ltd	Not transport related
14	Ministry of Education	Supported
15	Counties Energy Ltd	Not transport related
16	The Campaign for Better Transport Inc	Not supported
17	Singh H	Neutral

8: Mill Road - Pukekohe East Road Upgrade – Waikato

Submission	Submitter	Response
1	Telecommunications Submitters	Not transport related
2	Whitley A	Not supported
3	WDC Roding Team	Supported in part
4	Roose A and K	Supported in part (preliminary)
5	Lawrie D and L	Supported (preliminary)
6	Neumann D	Not transport related
7	Crane A	Not supported
8	FirstGas Ltd	Not transport related
9	Muir E	Supported in part (preliminary)
10	Muir L	Supported in part (preliminary)
11	Heritage NZ	Not transport related

ATTACHMENT FOUR

SUMMARY OF SUBMISSIONS (NOR2 & NOR8)

Summary of Submissions - Pukekohe : NOR 2 Drury – Pukekohe Link (Waka Kotahi)

Sub #	Submitter	Position	Property where stated	Key issues	Relief sought
1	Lloyd Harrison and Evelina Ah-Wong	oppose	143 Tuhimata Road NA90A/439	Stormwater; property; excavation	The Stormwater Wetland / Attenuation Device and outlet be moved approximately 150 metres further South towards the natural low area.
2	Stuart Owers	oppose	109 Sim Road	alternatives; road design	none stated
3	Rachel Beaurain	oppose	447 - 491 Sim Road	stormwater; noise; lighting; access	move road further west leaving 447-491 with one access to it; build below level of current Sim Road to mitigate noise and lighting from road; agree noise levels with affected homeowners.
4	Mr. Barnardus Jacobus Beaurain	oppose	469 Sim Road	stormwater; noise, lighting; access ; visual	Specific noise conditions; build below level of current Sim Road; Noise mitigation; street lighting concentrated on road only.
5	Telecommunications Submitters	oppose in part		access to future and existing assets , network utilities	changes to conditions
6	Catherine Joyce	oppose	337 Burt Road	Division of farmland into two parts	Shift highway as close to the railway as possible.
7	Madeline Robb	oppose	319E Sim Road	impact on rural productive land; impact on habitats; ecosystems and trees; cost	Preserve Redwood tree and Bat habitats on property
8	Bruce and Louise Postles	oppose	479 Sim Road	alternatives	Move the corridor west 100 m
9	John Ruddell	oppose	319c Sim Road	alternatives; property	none stated
10	Todd Matthew Brown	oppose	397 Burt Road	dust; vibration; air pollution; road design	Move highway away from existing houses on Burt Road and replace roundabouts with on and off ramps.
11	Roger Farley	oppose	31 Sim Road	alternatives; property	Stop the proposal for Sim Rd.
12	Glen McCall	oppose		property	Positioning road to follow the railway line.
13	David And Sue Carpenter	oppose	419 Sim Road	property; access; noise; traffic; alternatives.	Remove designation from 419 Sim Road or acquire in full.

14	XLU limited	oppose	319B Sim Road	property	reduce designation area on 319B Sim Road.
15	Michael Colin Dane	oppose	111 Sim Road	consultation	postpone decision, initiate peer review of Sim Road section.
16	PD & RA Berry	oppose	481 Sim Road	traffic; noise	Move the corridor away from 481 Sim Road and follow the railway line.
17	Fisher & Paykel Healthcare Limited	support	300-458 Karaka Road	employment and other positive effects	approve
18	D & K Sim Ltd	oppose	Bycroft Rd	property	none stated
19	Trevlyn Enterprises	oppose	83 Sim Road	property	none stated
20	Peter Sim	oppose	77 Sim Road	property	none stated
21	Roading & Asphalt Ltd	oppose	36 Sim Road	traffic	Decline designation
22	Public Works Advisory Limited	neutral		Residential dwellings impact and blight	changes to conditions
23	John Christopher Thompson	oppose	72 Sim Road	property; traffic; consultation; air pollution and noise	Removing the designation
24	KiwiRail Holdings Limited	support	Designation 6302-NIMT Designation 6311 Paerata Interchange	Access, impacts on services and consultation.	changes to conditions
25	McKean Family Trust	oppose in part	826 Runciman Road	Noise & vibration during construction; operation noise; transport effects during construction; landscape and visual effects.	changes to conditions
26	Watercare Services Limited	neutral		access to future and existing network utilities	changes to conditions
27	Ministry of Education	neutral		traffic, noise and other nuisance effects, existing and future schools	changes to conditions

28	Paerata 5 Farms Limited	oppose	412 Sim Road, 328 Sim Road	property; impacts on future development of FUZ land; lack of alignment between KR and SGA projects; alternatives assessment; road design; stormwater; geotech info; lapse period impact; road design; urban environment conditions.	decline or amend designation
29	Counties Energy Limited	support with amendments		Access to future and existing network utilities	changes to conditions
30	The Campaign for Better Transport Incorporated	neutral		Provision for cycle infrastructure; transport	none stated
31	Peter Haddad	oppose		consultation; road design; air and noise pollution; environmental effects	none stated
32	Hugh and Rae Ross	not stated	111A Sim Road	no benefit from route	none stated

Summary of Submissions – Pukekohe: Mill Road and Pukekohe East Road Upgrade (NoR 8) Waka Kotahi					
Sub #	Submitter	Position	Property where stated	Key issues	Relief sought
1	Anthony van Schalkwyk	support	165 Mill Road	traffic safety for visitors	wants explanation about safety for turning traffic
	AMJG Investment Attn: Yunmin Ma	neutral	rental property (not identified)	property	seeking compensation
3	Cade Hubert Daroux	Oppose	140 Pukekohe East Rd	Engagement; property; road design; trees; lapse period	none stated
4	Maimere Properties Ltd	neutral	197 Pukekohe East Rd	property; access; traffic , noise. Stormwater; reinstatement; speed;	Changes to conditions
5	MC Johnstone LJC Johnstone LF Williams	neutral	197 Pukekohe East Rd	property ; replacement of fences safety; access with median ; traffic , noise. Stormwater	likelihood of acceptance of the conditions listed in submission
6	Telecommunications Submitters	oppose in part	access to future and existing assets	network utilities	Changes to conditions
7	Chaein Jeon	neutral	197a Pukekohe East Road -	property impacts unclear	involved in decision making
8	Deirdre Twentyman	Oppose	100 Pukekohe East Road -	traffic, noise dust and emissions ; access; safety	look at alternative routes
9	Rodney Cunningham	Oppose	80 Mill Rd Bombay;	Access; property; property values; increase in runoff; exposure traffic, noise, vibration dust and visual pollution ;risk of theft	Change to property access ;and road design /management so residents (and others) can more easily make the extra distance (and travel time) having lost right turn
10	Paul Reynolds	Oppose	3 Pukekohe East Road	road design ; property	shift proposed roundabout south
11	Heritage New Zealand Pouhere Taonga	support	None	heritage related conditions	approve
12	Firstgas Ltd	neutral		Impact on pipeline; not shown in NoR drawings; network utilities	Changes to conditions

13	Watercare Services Limited	Neutral		Access to assets; network utilities	changes to conditions
14	Ministry of Education	Neutral	none	Construction impacts on schools	changes to conditions
15	Counties Energy Limited	Support		network utilities ;impact on 110kv line ; consultation	changes to conditions
16	The Campaign for Better Transport Incorporated	Support		lapse period; transport ; road design	none stated
17	Harjinder Singh c/-Singh and Kaur Ltd	Oppose	165C Mill road, Bombay;	property ; access; transport ; business effects	none stated but want concerns addressed

ATTACHMENT FIVE
CONDITIONS (NOR2 & NOR8)

Pukekohe Transport Network - Proposed Conditions for Waka Kotahi NoRs

NoR 2 – Drury to Pukekohe Link

NoR 8 (AC) – Mill Road – Pukekohe East Road Upgrade

Amended (~~deletions~~ and additions)

Abbreviations and definitions

Acronym/Term	Definition
Activity sensitive to noise	Any dwelling, visitor accommodation, boarding house, marae, papakāinga, integrated residential development, retirement village, supported residential care, care centre, lecture theatre in a tertiary education facility, classroom in an education facility and healthcare facility with an overnight stay facility.
AUP	Auckland Unitary Plan.
BPO or Best Practicable Option	Has the same meaning as in section 2 of the RMA 1991.
CEMP	Construction Environmental Management Plan
Certification	Confirmation from the Manager that a material change to a management plan has been prepared in accordance with the condition to which it relates. A material change to a management plan shall be deemed certified: (a) where the Requiring Authority has received written confirmation from Council that the material change to the management plan is certified; (b) ten working days from the submission of the material change to the management plan where no written confirmation of certification has been received; or (c) five working days from the submission of the material change to a CNVMP Schedule where no written confirmation or certification has been received.
CNVMP	Construction Noise and Vibration Management Plan
CNVMP Schedule or Schedule	A schedule to the CNVMP
Completion of Construction	When construction of the Project (or part of the Project) is complete and it is available for use.
Confirmed Biodiversity Areas	Areas recorded in the Identified Biodiversity Area Schedule where the ecological values and effects have been confirmed through the ecological survey under Condition 22 .
Construction Works	Activities undertaken to construct the Project excluding Enabling Works.
Council	Auckland Council
CTMP	Construction Traffic Management Plan
<u>Educational facilities</u>	<u>Facility used for education to secondary level.</u> <u>Includes:</u> <u>•Schools and outdoor education facilities; and</u> <u>•Accommodation, administrative, cultural, religious, health, retail, and communal facilities accessory to the above.</u> <u>Excludes:</u> <u>•Care centres; and</u> <u>•Tertiary education facilities</u>
EMP	Ecological Management Plan

Acronym/Term	Definition
EIANZ Guidelines	Ecological Impact Assessment: EIANZ guidelines for use in New Zealand: terrestrial and freshwater ecosystems, second edition, dated May 2018.
Enabling works	Includes, but is not limited to, the following and similar activities: <ul style="list-style-type: none"> • geotechnical investigations (including trial embankments) • archaeological site investigations • formation of access for geotechnical investigations • establishment of site yards, site entrances and fencing • constructing and sealing site access roads • demolition or removal of buildings and structures • relocation of services • establishment of mitigation measures (such as erosion and sediment control measures, temporary noise walls, earth bunds and planting)
HHMP	Historic Heritage Management Plan
HNZPT	Heritage New Zealand Pouhere Taonga.
HNZPTA	Heritage New Zealand Pouhere Taonga Act 2014
Identified Biodiversity Area	Means an area or areas of ecological value where the Project ecologist has identified that the project will potentially have a moderate or greater level of ecological effect, prior to implementation of impact management measures, as determined in accordance with the EIANZ guidelines.
Manager	The Manager – Resource Consents of the Auckland Council, or authorised delegate.
Mana Whenua	Mana Whenua as referred to in the conditions are considered to be the following (in no particular order), who at the time of Notice of Requirement expressed a desire to be involved in the Project: <ul style="list-style-type: none"> • Ngaati Te Ata Waiohua • Ngāti Tamaoho • Te Ākitai Waiohua • Ngāti Whanaunga Note: other iwi not identified above may have an interest in the project and should be consulted.
Network Utility Operator	Has the same meaning as set out in section 166 of the RMA.
NUMP	Network Utilities Management Plan
NOR	Notice of Requirement
NZAA	New Zealand Archaeological Association
Outline Plan	An outline plan prepared in accordance with section 176A of the RMA.
Project Liaison Person	The person or persons appointed for the duration of the Project's Construction Works to be the main point of contact for persons wanting information about the Project or affected by the Construction Works.
Protected Premises and Facilities (PPF)	Protected Premises and Facilities as defined in New Zealand Standard NZS 6806:2010: <i>Acoustics – Road-traffic noise – New and altered roads</i> .
Requiring Authority	Has the same meaning as section 166 of the RMA and, for this Designation is New Zealand Transport Agency.
RMA	Resource Management Act (1991)

Acronym/Term	Definition
SCEMP	Stakeholder Communication and Engagement Management Plan
<u>Stakeholders</u>	<p><u>Stakeholders to be identified in accordance with Condition [x], which may include as appropriate:</u></p> <ul style="list-style-type: none"> a) <u>Adjacent owners and occupiers;</u> b) <u>Adjacent business owners and occupiers;</u> c) <u>Central and local government bodies;</u> d) <u>Community groups;</u> e) <u>Developers;</u> f) <u>Development agencies;</u> g) <u>Educational facilities; and</u> h) <u>Network utility operators.</u>
Stage of Work	Any physical works that require the development of an Outline Plan.
Start of Construction	The time when Construction Works (excluding Enabling Works) start.
Suitably Qualified Person	A person (or persons) who can provide sufficient evidence to demonstrate their suitability, experience and competence in the relevant field of expertise.
ULDMP	Urban and Landscape Design Management Plan

NoR(s)	No.	Condition
General Conditions		
2 and 8	1.	<p>Activity in General Accordance with Plans and Information</p> <p>(a) Except as provided for in the conditions below, and subject to final design and Outline Plan(s), works within the designation shall be undertaken in general accordance with the Project description and concept plan in Schedule 1:</p> <p>(b) Where there is inconsistency between:</p> <ol style="list-style-type: none"> (i) the Project description and concept plan in Schedule 1 and the requirements of the following conditions, the conditions shall prevail; (ii) the Project description and concept plan in Schedule 1, and the management plans under the conditions of the designation, the requirements of the management plans shall prevail.
2 and 8	2.	<p>Project Information</p> <p>(a) A project website, or equivalent virtual information source, shall be established within 12 months of the date on which this designation is included in the AUP. All directly affected owners and occupiers shall be notified in writing once the website or equivalent information source has been established. The project website or virtual information source shall include these conditions and shall provide information on:</p> <ol style="list-style-type: none"> (i) the status of the Project; (ii) anticipated construction timeframes; (iii) contact details for enquiries; (iv) the implications of the designation for landowners, occupiers and business owners and operators within the designation and information on how/where they can receive additional support following confirmation of the designation; <ol style="list-style-type: none"> (i) a subscription service to enable receipt of project updates by email; and (ii) when and how to apply for consent for works in the designation under s176(1)(b) of the RMA. <p>(b) At the start of detailed design for a Stage of Work, the project website or virtual information source shall be updated to provide information on the likely date for Start of Construction, and any staging of works.</p>
2 and 8	3.	<p>Designation Review</p> <p>(a) The Requiring Authority shall within 6 months of Completion of Construction or as soon as otherwise practicable:</p> <ol style="list-style-type: none"> (i) review the extent of the designation to identify any areas of designated land that it no longer requires for the on-going operation, maintenance or mitigation of effects of the Project; and (ii) give notice to Auckland Council in accordance with section 182 of the RMA for the removal of those parts of the designation identified above.
2 and 8	4.	<p>Lapse</p> <p>(a) In accordance with section 184(1)(c) of the RMA, this designation shall lapse if not given effect to within 20 years from the date on which it is included in the AUP.</p>
2 and 8	5.	<p>Network Utility Operators (Section 176 Approval)</p> <p>(a) Prior to the start of Construction Works, Network Utility Operators with existing infrastructure located within the designation will not require written consent under section 176 of the RMA for the following activities:</p> <ol style="list-style-type: none"> (i) operation, maintenance and urgent repair works; (ii) minor renewal works to existing network utilities necessary for the on-going provision or security of supply of network utility operations; (iii) minor works such as new service connections; and (iv) the upgrade and replacement of existing network utilities in the same location with the same or similar effects as the existing utility. <p>(b) To the extent that a record of written approval is required for the activities listed above, this condition shall constitute written approval.</p>
Pre-construction Conditions		

NoR(s)	No.	Condition
2	6.	<p>Outline Plan</p> <p>(a) An Outline Plan (or Plans) shall be prepared in accordance with section 176A of the RMA.</p> <p>(b) Outline Plans (or Plan) may be submitted in parts or in stages to address particular activities (e.g. design or construction aspects), or a Stage of Work of the Project.</p> <p>(c) Outline Plans shall include any management plan or plans that are relevant to the management of effects of those activities or Stage of Work, which may include:</p> <ul style="list-style-type: none"> (i) Construction Environmental Management Plan; (ii) Construction Traffic Management Plan; (iii) Construction Noise and Vibration Management Plan; Urban and Landscape Design Management Plan; (iv) Ecological Management Plan; and (v) Network Utilities Management Plan.
8	6.	<p>Outline Plan</p> <p>(a) An Outline Plan (or Plans) shall be prepared in accordance with section 176A of the RMA.</p> <p>(b) Outline Plans (or Plan) may be submitted in parts or in stages to address particular activities (e.g. design or construction aspects), or a Stage of Work of the Project.</p> <p>(c) Outline Plans shall include any management plan or plans that are relevant to the management of effects of those activities or Stage of Work, which may include:</p> <ul style="list-style-type: none"> (i) Construction Environmental Management Plan; (ii) Construction Traffic Management Plan; (iii) Construction Noise and Vibration Management Plan; (iv) Urban and Landscape Design Management Plan; (v) Historic Heritage Management Plan; (vi) Ecological Management Plan; (vi) Tree Management Plan; and (vii) Network Utilities Management Plan.
2 and 8	7.	<p>Management Plans</p> <p>(a) Any management plan shall:</p> <ul style="list-style-type: none"> (i) Be prepared and implemented in accordance with the relevant management plan condition; (ii) Be prepared by a Suitably Qualified Person(s); (iii) Include sufficient detail relating to the management of effects associated with the relevant activities and/or Stage of Work to which it relates. (iv) Summarise comments received from Mana Whenua and other stakeholders as required by the relevant management plan condition, along with a summary of where comments have: <ul style="list-style-type: none"> A. Been incorporated; and B. Where not incorporated, the reasons why. (v) Be submitted as part of an Outline Plan pursuant to s176A of the RMA, with the exception of SCEMPs and CNVMP Schedules. (vi) Once finalised, uploaded to the Project website or equivalent virtual information source. <p>(b) Any management plan developed in accordance with Condition 7 may:</p> <ul style="list-style-type: none"> (i) Be submitted in parts or in stages to address particular activities (e.g. design or construction aspects) a Stage of Work of the Project, or to address specific activities authorised by the designation. (ii) Except for material changes, be amended to reflect any changes in design, construction methods or management of effects without further process. (iii) If there is a material change required to a management plan which has been submitted with an Outline Plan, the revised part of the plan shall be submitted to the Council as an update to the Outline Plan or for Certification as soon as practicable following identification of the need for a revision; <p>(c) Any material changes to the SCEMPs, are to be submitted to the Council for information.</p>
2 and 8	8.	<p>Stakeholder and Communication and Engagement Management Plan (SCEMP)</p>

NoR(s)	No.	Condition
		<p>(a) A SCEMP shall be prepared in consultation with stakeholders, community groups and organisations prior to any Outline Plan being submitted</p> <p>(b) The objective of the SCEMP is to identify how the public and stakeholders (including directly affected and adjacent owners and occupiers of land) will be engaged with prior to and throughout the Construction Works. To achieve the objective of the SCEMP:</p> <p>(i) At least 18 months prior to any Outline Plan being submitted, the Requiring Authority shall identify:</p> <p>A. The properties whose owners will be engaged with;</p> <p>B. A list of key stakeholders, community groups, organisations and businesses who will be engaged with;</p> <p>C. Methods and timing to engage with landowners and occupiers whose access is directly affected.</p> <p>(ii) The SCEMP shall include:</p> <p>A. Details of (b)(i)A to C;</p> <p>B. the contact details for the Project Liaison Person. These details shall be on the Project website, or equivalent virtual information source, and prominently displayed at the main entrance(s) to the site(s);</p> <p>C. the procedures for ensuring that there is a contact person available for the duration of Construction Works, for public enquiries or complaints about the Construction Works;</p> <p>D. methods for engaging with Mana Whenua, to be developed in consultation with Mana Whenua;</p> <p>E. methods to communicate key project milestones and the proposed hours of construction activities including outside of normal working hours and on weekends and public holidays, to the parties identified in (b)(i)A and B; and</p> <p>F. linkages and cross-references to communication and engagement methods set out in other conditions and management plans where relevant.</p> <p>(c) Any SCEMP prepared for a Stage of Work shall be submitted to Council for information ten working days prior to the Start of Construction for a Stage of Work.</p>
2	9.	<p>Cultural Advisory Report</p> <p>(a) At least six (6) months prior to the start of detailed design for a Stage of Work, Mana Whenua shall be invited to prepare a Cultural Advisory Report for the Project.</p> <p>(b) The objective of the Cultural Advisory Report is to assist in understanding and identifying Ngā Taonga Tuku Iho ('treasures handed down by our ancestors') affected by the Project, to inform their management and protection. To achieve the objective, the Requiring Authority shall invite Mana Whenua to prepare a Cultural Advisory Report that:</p> <p>(i) Identifies the cultural sites, landscapes and values that have the potential to be affected by the construction and operation of the Project;</p> <p>(ii) Sets out the desired outcomes for management of potential effects on cultural sites, landscapes and values;</p> <p>(iii) Identifies traditional cultural practices within the area that may be impacted by the Project;</p> <p>(iv) Identifies opportunities for restoration and enhancement of identified cultural sites, landscapes and values within the Project area;</p> <p>(v) Taking into account the outcomes of (i) to (iv) above, identify cultural matters and principles that should be considered in the development of the Urban and Landscape Design Management Plan and the Cultural Monitoring Plan referred to in Conditions 10 and 15.</p> <p>(vi) Identifies and (if possible) nominates traditional names along the Project alignment. Noting there may be formal statutory processes outside the project required in any decision-making.</p> <p>(c) The desired outcomes for management of potential effects on cultural sites, landscapes and values identified in the Cultural Advisory Report shall be discussed with Mana Whenua and those outcomes reflected in the relevant management plans where practicable.</p> <p>(d) Conditions 9(b) and (c) above will cease to apply if:</p> <p>(i) Mana Whenua have been invited to prepare a Cultural Advisory Report by a date at least 6 months prior to start of Construction Works; and</p> <p>(ii) Mana Whenua have not provided a Cultural Advisory Report within six months prior to start of Construction Works.</p>

NoR(s)	No.	Condition
8	9.	<p>Cultural Advisory Report</p> <p>(a) At least six (6) months prior to the start of detailed design for a Stage of Work, Mana Whenua shall be invited to prepare a Cultural Advisory Report for the Project.</p> <p>(b) The objective of the Cultural Advisory Report is to assist in understanding and identifying Ngā Taonga Tuku Iho ('treasures handed down by our ancestors') affected by the Project, to inform their management and protection. To achieve the objective, the Requiring Authority shall invite Mana Whenua to prepare a Cultural Advisory Report that:</p> <ul style="list-style-type: none"> (i) Identifies the cultural sites, landscapes and values that have the potential to be affected by the construction and operation of the Project; (ii) Sets out the desired outcomes for management of potential effects on cultural sites, landscapes and values; (iii) Identifies traditional cultural practices within the area that may be impacted by the Project; (iv) Identifies opportunities for restoration and enhancement of identified cultural sites, landscapes and values within the Project area; (v) Taking into account the outcomes of (i) to (iv) above, identify cultural matters and principles that should be considered in the development of the Urban and Landscape Design Management Plan, Historic Heritage Management Plan and the Cultural Monitoring Plan referred to in Conditions 10, 15 and 21. (vi) Identifies and (if possible) nominates traditional names along the Project alignment. Noting there may be formal statutory processes outside the project required in any decision-making. <p>(c) The desired outcomes for management of potential effects on cultural sites, landscapes and values identified in the Cultural Advisory Report shall be discussed with Mana Whenua and those outcomes reflected in the relevant management plans where practicable.</p> <p>(d) Conditions 9(b) and (c) above will cease to apply if:</p> <ul style="list-style-type: none"> (i) Mana Whenua have been invited to prepare a Cultural Advisory Report by a date at least 6 months prior to start of Construction Works; and (ii) Mana Whenua have not provided a Cultural Advisory Report within six months prior to start of Construction Works.
2	10.	<p>Urban and Landscape Design Management Plan (ULDMP)</p> <p>(a) A ULDMP shall be prepared prior to the Start of Construction for a Stage of Work.</p> <p>(b) The objective of the ULDMP(s) is to:</p> <ul style="list-style-type: none"> (i) Enable integration of the Project's permanent works into the surrounding landscape and urban context; and (ii) Ensure that the Project manages potential adverse landscape and visual effects as far as practicable and contributes to a quality urban environment. <p>(c) Mana Whenua shall be invited to participate in the development of the ULDMP(s) to provide input into relevant cultural landscape and design matters including how desired outcomes for management of potential effects on cultural sites, landscapes and values identified and discussed in the Cultural Advisory Report in Condition 9 may be reflected in the ULDMP.</p> <p>(d) Key stakeholders identified through Conditions 8(b)(i)B shall be invited to participate in the development of the ULDMP at least six (6) months prior to the start of detailed design for a Stage of Work.</p> <p>(e) The ULDMP shall be prepared in general accordance with:</p> <ul style="list-style-type: none"> (i) Auckland Transport's Urban Roads and Streets Design Guide; (ii) Waka Kotahi Urban Design Guidelines: Bridging the Gap (2013) or any subsequent updated version; (iii) Waka Kotahi Landscape Guidelines (2013) or any subsequent updated version; (iv) Waka Kotahi P39 Standard Specification for Highway Landscape Treatments (2013) or any subsequent updated version; and (v) Auckland's Urban Ngahere (Forest) Strategy or any subsequent updated version. <p>(f) To achieve the objective, the ULDMP(s) shall provide details of how the project:</p> <ul style="list-style-type: none"> (i) Is designed to integrate with the adjacent urban (or proposed urban) and landscape context, including the surrounding existing or proposed topography, urban environment (i.e. centres and density of built form), natural environment, landscape character and open space zones; <ul style="list-style-type: none"> (ia) resolves any potential conflict between placemaking aspirations within local communities and the scale and operation of the Project.

NoR(s)	No.	Condition
		<p style="text-align: center;"><u>_____ (ib) enables buildings and spaces to positively address and integrate with the corridor.</u></p> <p>(ii) Provides appropriate walking and cycling connectivity to, and interfaces with, existing or proposed adjacent land uses, public transport infrastructure and walking and cycling connections;</p> <p>(iii) Promotes inclusive access (where appropriate); and</p> <p>(iv) Promotes a sense of personal safety by aligning with best practice guidelines, such as:</p> <ul style="list-style-type: none"> A. Crime Prevention Through Environmental Design (CPTED) principles; B. Safety in Design (SID) requirements; and C. Maintenance in Design (MID) requirements and anti-vandalism/anti-graffiti measures. <p style="text-align: center;"><u>(v) Accommodates site compounds, construction yards, storage of construction machinery and any overburden in areas that are visually discrete (avoiding hilltops and ridgelines where practicable). As a minimum screening of these elements is required during the construction period.</u></p> <p>(g) <u>With reference to the Outcomes and Opportunities plans included in Appendix B of the Urban Design Evaluation for the Notice of Requirement (September 2023), t The ULDMP(s) shall include:</u></p> <ul style="list-style-type: none"> (i) A concept plan – which depicts the overall landscape and urban design concept, and explain the rationale for the landscape and urban design proposals; (ii) Developed design concepts, including principles for walking and cycling facilities and public transport; and (iii) Landscape and urban design details – that cover the following: <ul style="list-style-type: none"> A. Road design – elements such as intersection form, carriageway gradient and associated earthworks contouring including cut and fill batters and the interface with adjacent land uses and existing roads (including slip lanes), benching, spoil disposal sites, median width and treatment, roadside width and treatment; B. Roadside elements – such as lighting, fencing, wayfinding and signage; C. Architectural and landscape treatment of all major structures, including bridges and retaining walls; D. Architectural and landscape treatment of noise barriers; E. Landscape treatment of permanent stormwater control wetlands and swales; F. Integration of passenger transport; G. Pedestrian and cycle facilities including paths, road crossings and dedicated pedestrian/ cycle bridges or underpasses; and H. Re-instatement of construction and site compound areas, driveways, accessways and fences. <p>(h) The ULDMP shall also include the following planting details and maintenance requirements:</p> <ul style="list-style-type: none"> (i) planting design details including: <ul style="list-style-type: none"> A. Identification of existing trees and vegetation that will be retained and any planting requirements under the Ecological Management Plan (Condition 24). Where practicable, mature trees and native vegetation should be retained; B. Street trees, shrubs and ground cover suitable for the location; C. treatment of fill slopes to integrate with adjacent land use, streams, riparian margins and open space zones; D. planting of stormwater wetlands and swales; E. Integration of any planting requirements required by conditions of any resource consents for the project; and F. Re-instatement planting of construction and site compound areas as appropriate. (ii) A planting programme including the staging of planting in relation to the construction programme which shall, as far as practicable, include provision for planting within each planting season following completion of works in each Stage of Work; and (iii) Detailed specifications relating to the following: <ul style="list-style-type: none"> A. Weed control and clearance; B. Pest animal management (to support plant establishment); C. Ground preparation (top soiling and decompaction);

NoR(s)	No.	Condition
		<p>D. Mulching; and E. Plant sourcing and planting, including hydroseeding and grassing, and use of eco-sourced species.</p> <p>Advice Note:</p> <p><i>This designation is for the purpose of construction, operation and maintenance of an arterial transport corridor and it is not for the specific purpose of “road widening”. Therefore, it is not intended that the front yard definition in the Auckland Unitary Plan which applies a set back from a designation for road widening purposes applies to this designation. A set back is not required to manage effects between the designation boundary and any proposed adjacent sites or lots.</i></p>
8	10.	<p>Urban and Landscape Design Management Plan (ULDMP)</p> <p>(a) A ULDMP shall be prepared prior to the Start of Construction for a Stage of Work.</p> <p>(b) The objective of the ULDMP(s) is to:</p> <p>(i) Enable integration of the Project's permanent works into the surrounding landscape and urban context; and</p> <p>(ii) Ensure that the Project manages potential adverse landscape and visual effects as far as practicable and contributes to a quality urban environment.</p> <p>(c) Mana Whenua shall be invited to participate in the development of the ULDMP(s) to provide input into relevant cultural landscape and design matters including how desired outcomes for management of potential effects on cultural sites, landscapes and values identified and discussed in the Cultural Advisory Report in Condition 9 may be reflected in the ULDMP.</p> <p>(i) Key stakeholders identified through Conditions 8(b)(i)B shall be invited to participate in the development of the ULDMP at least six (6) months prior to the start of detailed design for a Stage of Work.</p> <p>(d) The ULDMP shall be prepared in general accordance with:</p> <p>(i) Waka Kotahi Urban Design Guidelines: Bridging the Gap (2013) or any subsequent updated version;</p> <p>(ii) Waka Kotahi Landscape Guidelines (2013) or any subsequent updated version;</p> <p>(iii) Waka Kotahi P39 Standard Specification for Highway Landscape Treatments (2013) or any subsequent updated version; and</p> <p>(iv) Auckland's Urban Ngahere (Forest) Strategy or any subsequent updated version.</p> <p>(e) To achieve the objective, the ULDMP(s) shall provide details of how the project:</p> <p>(i) Is designed to integrate with the adjacent urban (or proposed urban) and landscape context, including the surrounding existing or proposed topography, urban environment (i.e. centres and density of built form), natural environment, landscape character and open space zones;</p> <p>(ii) Provides appropriate walking and cycling connectivity to, and interfaces with, existing or proposed adjacent land uses, public transport infrastructure and walking and cycling connections;</p> <p>(iii) Promotes inclusive access (where appropriate); and</p> <p>(iv) Promotes a sense of personal safety by aligning with best practice guidelines, such as:</p> <p>A. Crime Prevention Through Environmental Design (CPTED) principles;</p> <p>B. Safety in Design (SID) requirements; and</p> <p>C. Maintenance in Design (MID) requirements and anti-vandalism/anti-graffiti measures.</p> <p>(f) The ULDMP(s) shall include:</p> <p>(i) A concept plan – which depicts the overall landscape and urban design concept, and explain the rationale for the landscape and urban design proposals;</p> <p style="padding-left: 40px;">(ia) resolves any potential conflict between placemaking aspirations within local communities and the scale and operation of the Project.</p> <p>(ii) (ib) enables buildings and spaces to positively address and integrate with the corridor.</p> <p>(iii) Developed design concepts, including principles for walking and cycling facilities and public transport; and</p> <p>(iv) Landscape and urban design details – that cover the following:</p> <p>A. Road design – elements such as intersection form, carriageway gradient and associated earthworks contouring including cut and fill batters and the interface with adjacent land uses and existing roads (including slip lanes),</p>

NoR(s)	No.	Condition
		<p>benching, spoil disposal sites, median width and treatment, roadside width and treatment;</p> <p>B. Roadside elements – such as lighting, fencing, wayfinding and signage;</p> <p>C. Architectural and landscape treatment of all major structures, including bridges and retaining walls;</p> <p>D. Architectural and landscape treatment of noise barriers;</p> <p>E. Landscape treatment of permanent stormwater control wetlands and swales;</p> <p>F. Integration of passenger transport;</p> <p>G. Pedestrian and cycle facilities including paths, road crossings and dedicated pedestrian/ cycle bridges or underpasses;</p> <p>H. Historic heritage places with reference to the HHMP (Condition 21); and</p> <p>I. Re-instatement of construction and site compound areas, driveways, accessways and fences.</p> <p>(g) The ULDMP shall also include the following planting details and maintenance requirements:</p> <p>(i) planting design details including:</p> <p>A. Identification of existing trees and vegetation that will be retained and any planting requirements under the Ecological Management Plan (Condition 23) and Tree Management Plan (Condition 24); with reference to the Tree Management Plan. Where practicable, mature trees and native vegetation should be retained;</p> <p>B. Street trees, shrubs and ground cover suitable for the location;</p> <p>C. treatment of fill slopes to integrate with adjacent land use, streams, Riparian margins and open space zones;</p> <p>D. planting of stormwater wetlands;</p> <p>E. Integration of any planting requirements required by conditions of any resource consents for the project; and</p> <p>F. Re-instatement planting of construction and site compound areas as appropriate.</p> <p>(ii) A planting programme including the staging of planting in relation to the construction programme which shall, as far as practicable, include provision for planting within each planting season following completion of works in each Stage of Work; and</p> <p>(iii) Detailed specifications relating to the following:</p> <p>A. Weed control and clearance;</p> <p>B. Pest animal management (to support plant establishment);</p> <p>C. Ground preparation (top soiling and decompaction);</p> <p>D. Mulching; and</p> <p>E. Plant sourcing and planting, including hydroseeding and grassing, and use of eco-sourced species.</p> <p>Advice Note:</p> <p><i>This designation is for the purpose of construction, operation and maintenance of an arterial transport corridor and it is not for the specific purpose of “road widening”. Therefore, it is not intended that the front yard definition in the Auckland Unitary Plan which applies a set back from a designation for road widening purposes applies to this designation. A set back is not required to manage effects between the designation boundary and any proposed adjacent sites or lots.</i></p>
Specific Outline Plan Requirements		
2 and 8		<p>Flood Hazard</p> <p>For the purpose of Condition 12:</p> <p>(a) ARI – means Average Recurrence Interval</p> <p>(b) Existing authorised habitable floor – means the floor level of any room (floor) in a residential building which is authorised by building consent and exists at the time the outline plan is submitted, excluding a laundry, bathroom, toilet or any room used solely as an entrance hall, passageway or garage.</p> <p>(c) Flood prone area – means a potential ponding area that relies on a single culvert for drainage and does not have an overland flow path.</p>

NoR(s)	No.	Condition
		<p>(d) Maximum Probable Development – is the design case for consideration of future flows allowing for development within a catchment that takes into account the maximum impervious surface limits of the current zone or if the land is zoned Future Urban in the AUP, the probable level of development arising from zone changes.</p> <p>(e) Pre-Project development – means existing site condition prior to the Project (including existing buildings and roadways).</p> <p>(f) Post-Project development – means site condition after the Project has been completed (including existing and new buildings and roadways).</p>
2 and 8	11.	<p>Flood Hazard</p> <p>(a) The Project shall be designed to achieve the following flood risk outcomes:</p> <ul style="list-style-type: none"> (i) <u>no increase in flood levels for existing authorised habitable, community, commercial, industrial floors that are already subject to flooding; or have a freeboard less than 150mm;</u> (ii) no more than a 10% reduction in freeboard for existing authorised habitable floors; (iii) no increase of more than 50mm in flood level on land zoned for urban or future urban development where there is no existing dwelling; (iv) no new flood prone areas; and (v) <u>Maintain the minimum freeboard requirement outlined in the relevant code of practice at time the Outline Plan is submitted (currently, Auckland Code of Practice for Land Development for Subdivision Chapter 4: Stormwater Version 3.0, January 2022);</u> (vi) <u>No increase in flood plain extent unless there is a site-specific flood assessment to show there is no reduction in developable land in urban or Future Urban Zone;</u> (vii) <u>New overland flow paths shall be diverted away from habitable floors and discharge to a suitable location with no increase in flood levels in a 1% AEP event downstream;</u> (viii) <u>No loss in conveyance capacity or change in alignment of existing overland flow paths, unless provided by other means;</u> (ix) <u>No new flood prone areas; and</u> (x) <u>No more than a 10% average increase of flood classification flood hazard (defined as flow depth times velocity) for main vehicle and pedestrian access to authorised habitable dwellings existing at the time the Outline Plan is submitted. The assessment of flood hazard shall be undertaken for the 10% and 1% AEP rainfall events.</u> <p>(b) Compliance with this condition shall be demonstrated in the Outline Plan <u>developed in consultation with the Auckland Council Healthy Waters (or its equivalent),</u> which shall include flood modelling of the pre-Project and post-Project 400-year 1% AEP ARI flood levels (for Maximum Probable Development land use and including climate change).</p> <p>(c) Where the above outcomes can be achieved through alternative measures outside of the designation such as flood stop banks, flood walls, raising existing authorised habitable floor level and new overland flow paths or varied through agreement with the relevant landowner, the Outline Plan shall include confirmation that any necessary landowner and statutory approvals have been obtained for that work or alternative outcome.</p> <p><u>Advice Note:</u> <u>Consultation with Auckland Council Healthy Waters (or its equivalent) to identify opportunities for collaboration on catchment improvement projects is encouraged at the detailed design stage.</u></p>
2 and 8	12.	Existing property access

NoR(s)	No.	Condition
		Prior to submission of the Outline Plan, consultation shall be undertaken with landowners and occupiers whose vehicle access to their property will be altered by the project. The Outline Plan shall demonstrate how safe, <u>adequate, and efficient</u> reconfigured or alternate access will be provided, unless otherwise agreed with the landowner.
Construction Conditions		
2 and 8	13.	<p>Construction Environmental Management Plan (CEMP)</p> <p>(a) A CEMP shall be prepared prior to the Start of Construction for a Stage of Work. The objective of the CEMP is to set out the management procedures and construction methods to be undertaken to, avoid, remedy or mitigate any adverse effects associated with Construction Works as far as practicable. To achieve the objective, the CEMP shall include:</p> <ul style="list-style-type: none"> (i) the roles and responsibilities of staff and contractors; (ii) details of the site or project manager and the Project Liaison Person, including their contact details (phone and email address); (iii) the Construction Works programmes and the staging approach, and the proposed hours of work; (iv) details of the proposed construction yards including temporary screening when adjacent to residential areas, locations of refuelling activities and construction lighting; (v) methods for controlling dust and the removal of debris and demolition of construction materials from public roads or places; (vi) methods for providing for the health and safety of the general public; (vii) measures to mitigate flood hazard effects such as siting stockpiles out of floodplains, minimising obstruction to flood flows, actions to respond to warnings of heavy rain; (viii) procedures for incident management; (ix) procedures for the refuelling and maintenance of plant and equipment to avoid discharges of fuels or lubricants to Watercourses; (x) measures to address the storage of fuels, lubricants, hazardous and/or dangerous materials, along with contingency procedures to address emergency spill response(s) and clean up; (xi) procedures for responding to complaints about Construction Works; and (xii) methods for amending and updating the CEMP as required. <p><u>Advice Note:</u></p> <p><u>The assessment of the potential for contaminated land had not been undertaken at the time of submitting the notice of requirement and will need to be completed to determine if a resource consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 is required prior to earthworks commencing.</u></p>
2 and 8	14.	<p>Complaints Register</p> <p>(a) At all times during Construction Works, a record of any complaints received about the Construction Works shall be maintained. The record shall include:</p> <ul style="list-style-type: none"> (i) The date, time and nature of the complaint; (ii) The name, phone number and address of the complainant (unless the complainant wishes to remain anonymous); (iii) Measures taken to respond to the complaint (including a record of the response provided to the complainant) or confirmation of no action if deemed appropriate; (iv) The outcome of the investigation into the complaint; (v) Any other activities in the area, unrelated to the Project that may have contributed to the complaint, such as non-project construction, fires, traffic accidents or unusually dusty conditions generally. <p>(b) A copy of the Complaints Register required by this condition shall be made available to the Manager upon request as soon as practicable after the request is made.</p>
2 and 8	15.	Cultural Monitoring Plan

NoR(s)	No.	Condition
		<p>(a) Prior to the start of Construction Works, a Cultural Monitoring Plan shall be prepared by a Suitably Qualified Person(s) identified in collaboration with Mana Whenua. The objective of the Cultural Monitoring Plan is to identify methods for undertaking cultural monitoring to assist with management of any cultural effects during Construction works. The Cultural Monitoring Plan shall include:</p> <ul style="list-style-type: none"> (i) Requirements for formal dedication or cultural interpretation to be undertaken prior to start of Construction Works in areas identified as having significance to Mana Whenua; (ii) Requirements and protocols for cultural inductions for contractors and subcontractors; (iii) Identification of activities, sites and areas where cultural monitoring is required during particular Construction Works; (iv) Identification of personnel to undertake cultural monitoring, including any geographic definition of their responsibilities; and (v) Details of personnel to assist with management of any cultural effects identified during cultural monitoring, including implementation of the Accidental Discovery Protocol <p>(b) If Enabling Works involving soil disturbance are undertaken prior to the start of Construction Works, an Enabling Works Cultural Monitoring Plan shall be prepared by a Suitably Qualified Person identified in collaboration with Mana Whenua. This plan may be prepared as a standalone Enabling Works Cultural Monitoring Plan or be included in the main Construction Works Cultural Monitoring Plan.</p> <p>Advice Note: <i>Where appropriate, the Cultural Monitoring Plan shall align with the requirements of other conditions of the designation and resource consents for the Project which require monitoring during Construction Works.</i></p>
2 and 8	16.	<p>Construction Traffic Management Plan (CTMP)</p> <p>(a) A CTMP shall be prepared prior to the Start of Construction for a Stage of Work. The objective of the CTMP is to avoid, remedy or mitigate, as far as practicable, adverse construction traffic effects. To achieve this objective, the CTMP shall include:</p> <ul style="list-style-type: none"> (i) methods to manage the effects of temporary traffic management activities on traffic; (ii) measures to ensure the safety of all transport users; (iii) the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours (<u>for example on roads servicing educational facilities during pick up and drop off times</u>) to manage vehicular and pedestrian traffic near schools <u>educational facilities</u> or to manage traffic congestion; (iv) site access routes and access points for heavy vehicles, the size and location of parking areas for plant, construction vehicles and the vehicles of workers and visitors; (v) identification of detour routes and other methods to ensure the safe management and maintenance of traffic flows, including <u>public transport services</u>, pedestrians and cyclists; (vi) methods to maintain vehicle <u>access to and within</u> property and/or private roads <u>for all transport modes</u> where practicable, or to provide alternative access arrangements when it will not be; (vii) the management approach to loads on heavy vehicles, including covering loads of fine material, the use of wheel-wash facilities at site exit points and the timely removal of any material deposited or spilled on public roads; (viii) methods that will be undertaken to communicate traffic management measures to affected road users (e.g. residents/public/stakeholders/emergency services). (ix) details of minimum network performance parameters during the construction phase, including any measures to monitor compliance with the performance parameters. These could include maximum increases in journey time and traffic volumes along key routes; and (x) details of any measures proposed to be implemented in the event of thresholds identified in (ix) being exceeded. <p>(b) Auditing, monitoring and reporting requirements relating to traffic management activities shall be undertaken in accordance with the New Zealand Guide to Temporary Traffic Management or any subsequent version <u>replacement</u>.</p>
2 and 8	17.	Construction Noise Standards

NoR(s)	No.	Condition																																																										
		<p>(a) Construction noise shall be measured and assessed in accordance with NZS6803:1999 Acoustics – Construction Noise and shall comply with the noise standards set out in the following table as far as practicable:</p> <p>Table 17.1: Construction noise standards</p> <table border="1"> <thead> <tr> <th>Day of week</th> <th>Time period</th> <th>L_{Aeq}(15min)</th> <th>L_AF_{max}</th> </tr> </thead> <tbody> <tr> <td colspan="4" style="text-align: center;">Occupied activity sensitive to noise</td> </tr> <tr> <td rowspan="4">Weekday</td> <td>0630h - 0730h</td> <td>55 dB</td> <td>75 dB</td> </tr> <tr> <td>0730h - 1800h</td> <td>70 dB</td> <td>85 dB</td> </tr> <tr> <td>1800h - 2000h</td> <td>65 dB</td> <td>80 dB</td> </tr> <tr> <td>2000h - 0630h</td> <td>45 dB</td> <td>75 dB</td> </tr> <tr> <td rowspan="4">Saturday</td> <td>0630h - 0730h</td> <td>55 dB</td> <td>75 dB</td> </tr> <tr> <td>0730h - 1800h</td> <td>70 dB</td> <td>85 dB</td> </tr> <tr> <td>1800h - 2000h</td> <td>45 dB</td> <td>75 dB</td> </tr> <tr> <td>2000h - 0630h</td> <td>45 dB</td> <td>75 dB</td> </tr> <tr> <td rowspan="4">Sunday and Public Holidays</td> <td>0630h - 0730h</td> <td>45 dB</td> <td>75 dB</td> </tr> <tr> <td>0730h - 1800h</td> <td>55 dB</td> <td>85 dB</td> </tr> <tr> <td>1800h - 2000h</td> <td>45 dB</td> <td>75 dB</td> </tr> <tr> <td>2000h - 0630h</td> <td>45 dB</td> <td>75 dB</td> </tr> <tr> <td colspan="4" style="text-align: center;">Other occupied buildings</td> </tr> <tr> <td rowspan="2">All</td> <td>0730h – 1800h</td> <td>70 dB</td> <td></td> </tr> <tr> <td>1800h – 0730h</td> <td>75 dB</td> <td></td> </tr> </tbody> </table> <p>(b) Where compliance with the noise standards set out in Table 17.1 is not practicable, the methodology in Condition 20 shall apply.</p>	Day of week	Time period	L _{Aeq} (15min)	L _A F _{max}	Occupied activity sensitive to noise				Weekday	0630h - 0730h	55 dB	75 dB	0730h - 1800h	70 dB	85 dB	1800h - 2000h	65 dB	80 dB	2000h - 0630h	45 dB	75 dB	Saturday	0630h - 0730h	55 dB	75 dB	0730h - 1800h	70 dB	85 dB	1800h - 2000h	45 dB	75 dB	2000h - 0630h	45 dB	75 dB	Sunday and Public Holidays	0630h - 0730h	45 dB	75 dB	0730h - 1800h	55 dB	85 dB	1800h - 2000h	45 dB	75 dB	2000h - 0630h	45 dB	75 dB	Other occupied buildings				All	0730h – 1800h	70 dB		1800h – 0730h	75 dB	
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2 and 8	18.	<p>Construction Vibration Standards</p> <p>(a) Construction vibration shall be measured in accordance with ISO 4866:2010 'Mechanical vibration and shock – Vibration of fixed structures – Guidelines for the measurement of vibrations and evaluation of their effects on structures' and shall comply with the vibration standards set out in the following table as far as practicable.</p> <p>Table 18.1: Construction vibration criteria</p> <table border="1"> <thead> <tr> <th>Receiver</th> <th>Details</th> <th>Category A</th> <th>Category B</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Occupied Activities sensitive to noise</td> <td>Night-time 2000h – 0630h</td> <td>0.3mm/s ppv</td> <td>1mm/s ppv</td> </tr> <tr> <td>Daytime 0630h – 2000h</td> <td>1mm/s ppv</td> <td>5mm/s ppv</td> </tr> <tr> <td>Other occupied buildings</td> <td>Daytime 0630h – 2000h</td> <td>2mm/s ppv</td> <td>5mm/s ppv</td> </tr> <tr> <td>All other buildings</td> <td>At all other times Vibration transient</td> <td>5mm/s ppv</td> <td>BS 5228-2* Table B2</td> </tr> </tbody> </table>	Receiver	Details	Category A	Category B	Occupied Activities sensitive to noise	Night-time 2000h – 0630h	0.3mm/s ppv	1mm/s ppv	Daytime 0630h – 2000h	1mm/s ppv	5mm/s ppv	Other occupied buildings	Daytime 0630h – 2000h	2mm/s ppv	5mm/s ppv	All other buildings	At all other times Vibration transient	5mm/s ppv	BS 5228-2* Table B2																																							
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NoR(s)	No.	Condition				
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	At all other times Vibration continuous	5mm/s ppv	BS 5228-2* 50% of Table B2 values			
2 and 8	19.	<p>Construction Noise and Vibration Management Plan (CNVMP)</p> <p>(a) A CNVMP shall be prepared prior to the Start of Construction for a Stage of Work.</p> <p>(b) A CNVMP shall be implemented during the Stage of Work to which it relates.</p> <p>(c) The objective of the CNVMP is to provide a framework for the development and implementation of the Best Practicable Option for the management of construction noise and vibration effects to achieve the construction noise and vibration standards set out in Conditions 17 and 18 to the extent practicable. To achieve this objective, the CNVMP shall be prepared in accordance with Annex E2 of the New Zealand Standard NZS6803:1999 'Acoustics – Construction Noise' (NZS6803:1999) and the Waka Kotahi State highway construction and maintenance noise and vibration guide (version 1.1, 2019), and shall as a minimum, address the following:</p> <p>(i) Description of the works and anticipated equipment/processes;</p> <p>(ii) Hours of operation, including times and days when construction activities would occur;</p> <p>(iii) The construction noise and vibration standards for the project;</p> <p>(iv) Identification of receivers where noise and vibration standards apply;</p> <p>(v) A hierarchy of management and mitigation options including any requirements to limit night and works during other sensitive times, including Sundays and public holidays as far as practicable;</p> <p>(vi) Methods and frequency for monitoring and reporting on construction noise and vibration;</p> <p>(vii) Procedures for communication and engagement with nearby residents and stakeholders, including notification of proposed construction activities, the period of construction activities, and management of noise and vibration complaints;</p> <p>(viii) Contact details of the Project Liaison Person;</p> <p>(ix) Procedures for the regular training of the operators of construction equipment to minimise noise and vibration as well as expected construction site behaviours for all workers;</p> <p>(x) Procedures and requirements for the preparation of a Schedule to the CNVMP (Schedule) for those areas where compliance with the noise [Condition 17] and/or vibration standards [Condition 18] Category A or Category B will not be practicable.</p> <p>(xi) Identification of trigger levels for undertaking building condition surveys, which shall be below Category B day time levels;</p> <p>(xii) Procedures for undertaking building condition surveys before and after works to determine whether any cosmetic or structural damage has occurred as a result of construction vibration.</p> <p>(xiii) Methodology and programme of desktop and field audits and inspections to be undertaken to ensure that CNVMP, Schedules and the best practicable option for management of effects are being implemented</p> <p>(xiv) Requirements for review and update of the CNVMP.</p>				

NoR(s)	No.	Condition
2 and 8	20.	<p>Schedule to a CNVMP</p> <p>(a) Unless otherwise provided for in a CNVMP, a Schedule to the CNVMP (Schedule) shall be prepared prior to the start of the construction activity to which it relates by a Suitably Qualified Person, in consultation with the owners and occupiers of sites subject to the Schedule to the CNVMP, when:</p> <ul style="list-style-type: none"> (i) Construction noise is either predicted or measured to exceed the noise standards in Condition 17; (ii) Construction vibration is either predicted or measured to exceed the Category A standard at the receivers in Condition 18. <p>(b) The objective of the Schedule is to set out the Best Practicable Option measures to manage noise and/or vibration effects of the construction activity beyond those measures set out in the CNVMP. The Schedule shall include details such as:</p> <ul style="list-style-type: none"> (i) Construction activity location, start and finish times; (ii) The nearest neighbours to the construction activity; (iii) The predicted noise and/or vibration level for all receivers where the levels are predicted or measured to exceed the applicable standards in Conditions 17 and 18 and the predicted duration of the exceedance; (iv) For works proposed between 2000h and 0630h, the reasons why the proposed works must be undertaken during these hours and why they cannot be practicably undertaken during the daytime; (v) The proposed mitigation options that have been selected, and the options that have been discounted as being impracticable and the reasons why; (vi) A summary of the consultation undertaken with owners and occupiers of sites subject to the Schedule, and how consultation has and has not been taken into account; and (vii) Location, times and types of monitoring. <p>(c) The Schedule shall be submitted to the Manager for information at least 5 working days (except in unforeseen circumstances) in advance of Construction Works that are covered by the scope of the Schedule and shall form part of the CNVMP. If any comments are received from the Manager, these shall be considered by the Requiring Authority prior to implementation of the Schedule.</p> <p>(d) Where material changes are made to a Schedule required by this condition, the Requiring Authority shall consult the owners and/or occupiers of sites subject to the Schedule prior to submitting the amended Schedule to the Manager for information in accordance with (c) above. The amended Schedule shall document the consultation undertaken with those owners and occupiers, and how consultation outcomes have and have not been taken into account.</p>
8	21.	<p>Historic Heritage Management Plan (HHMP)</p> <p>(a) A HHMP shall be prepared in consultation with Council, HNZPT and Mana Whenua prior to the Start of Construction for a Stage of Work.</p> <p>(b) The objective of the HHMP is to protect historic heritage and to remedy and mitigate any residual effects as far as practicable. To achieve the objective, the HHMP shall identify:</p> <ul style="list-style-type: none"> (i) Any adverse direct and indirect effects on historic heritage sites and measures to appropriately avoid, remedy or mitigate any such effects, including a tabulated summary of these effects and measures; (ii) Methods for the identification and assessment of potential historic heritage places within the Designation to inform detailed design; (iii) Known historic heritage places and potential archaeological sites within the Designation, including identifying any archaeological sites for which an Archaeological Authority under the HNZPTA will be sought or has been granted; (iv) Any unrecorded archaeological sites or post-1900 heritage sites within the Designation, which shall also be documented and recorded; (v) Roles, responsibilities and contact details of Project personnel, Council and HNZPT representatives, Mana Whenua representatives, and relevant agencies involved with heritage and archaeological matters including surveys, monitoring of Construction Works, compliance with AUP accidental discovery rule, and monitoring of conditions; (vi) Specific areas to be investigated, monitored and recorded to the extent these are directly affected by the Project; (vii) The proposed methodology for investigating and recording post-1900 historic heritage sites (including buildings) that need to be destroyed, demolished or

NoR(s)	No.	Condition
		<p>relocated, including details of their condition, measures to mitigate any adverse effects and timeframe for implementing the proposed methodology, in accordance with the HNZPT Archaeological Guidelines Series No.1: Investigation and Recording of Buildings and Standing Structures (November 2018), or any subsequent version;</p> <p>(viii) Methods to acknowledge cultural values identified through Condition 9 where archaeological sites also involve ngā taonga tuku iho (treasures handed down by our ancestors) and where feasible and practicable to do so;</p> <p>(ix) Methods for avoiding, remedying or mitigation adverse effects on historic heritage places and sites within the Designation during Construction Works as far as practicable. These methods shall include, but are not limited to:</p> <ul style="list-style-type: none"> A. security fencing or hoardings around historic heritage places to protect them from damage during construction or unauthorised access; B. measures to mitigate adverse effects on historic heritage sites that achieve positive historic heritage outcomes such as increased public awareness and interpretation signage; C. Training requirements and inductions for contractors and subcontractors on historic heritage places within the Designation, legal obligations relating to unexpected discoveries, the AUP Accidental Discovery Rule (E11.6.1). The training shall be undertaken prior to the Start of Construction, under the guidance of a Suitably Qualified Person and Mana Whenua representatives (to the extent the training relates to cultural values identified under Condition 15; and <p>(c) Electronic copies of all historic heritage reports relating to historic heritage investigations (evaluation, excavation and monitoring), shall be submitted to the Manager within 12 months of completion.</p> <p>Accidental Discoveries</p> <p>Advice Note:</p> <p><i>The requirements for accidental discoveries of heritage items are set out in Rule E11.6.1 of the AUP and in the Waka Kotahi Minimum Standard P45 Accidental Archaeological Discovery Specification, or any subsequent version.</i></p>
2 and 8	22.	<p>Pre-Construction Ecological Survey</p> <p>(a) At the start of detailed design for a Stage of Work, an updated ecological survey shall be undertaken by a Suitably Qualified Person. The purpose of the survey is to inform the detailed design of ecological management plan by:</p> <ul style="list-style-type: none"> (i) Confirming whether the species of value within the Identified Biodiversity Areas recorded in the <i>Identified Biodiversity Area Schedule [2]</i>¹ are still present; (ii) Confirming whether the project will or may have a moderate or greater level of ecological effect on ecological species of value, prior to implementation of impact management measures, as determined in accordance with the EIANZ guidelines. <p>(b) If the ecological survey confirms the presence of ecological features of value in accordance with Condition 22(a)(i) and that effects are likely in accordance with Condition 22(a)(ii) then an Ecological Management Plan (or Plans) shall be prepared in accordance with Condition 23 for these areas (Confirmed Biodiversity Areas).</p>
2	23.	<p>Ecological Management Plan (EMP)</p> <p>(a) An EMP shall be prepared for any Confirmed Biodiversity Areas (confirmed through Condition 22) prior to the Start of Construction for a Stage of Work. The objective of the EMP is to minimise effects of the Project on the ecological features of value of Confirmed Biodiversity Areas as far as practicable. The EMP shall set out the methods that will be used to achieve the objective which may include:</p> <ul style="list-style-type: none"> (i) If an EMP is required in accordance with Condition 22(b) for the presence of long tail bats: <ul style="list-style-type: none"> A. Measures to minimise as far as practicable, disturbance from construction activities within the vicinity of any active long tail bat roosts (including maternity) that are discovered through survey until such roosts are confirmed to be vacant of bats.

¹ Schedule 2 in NoR 2 Drury – Pukekohe Link and NoR 8 Mill Road and Pukekohe East Road Upgrade

NoR(s)	No.	Condition
		<p>B. How the timing of any construction work in the vicinity of any maternity long tail bat roosts will be limited to outside the bat maternity period (between December and March) where reasonably practicable;</p> <p>C. Details of areas where vegetation is to be retained where practicable for the purposes of the connectivity of long tail bats;</p> <p>D. Details of how bat connectivity will be provided and maintained (e.g. through the presence of suitable indigenous or exotic trees or artificial alternatives);</p> <p>E. Details of measures to minimise operational disturbance from light spill; and</p> <p>F. Details of where opportunities for advance restoration / mitigation planting have previously been identified and implemented.</p> <p>(ii) If an EMP is required in accordance with the Condition 22(b) for the presence of Threatened or At-Risk birds (excluding wetland birds):</p> <p>A. How the timing of any Construction Works shall be undertaken outside of the bird breeding season (September to February) where practicable; and</p> <p>B. Where works are required within the area identified in the Confirmed Biodiversity Area during the bird breeding season, methods to minimise adverse effects on Threatened or At-Risk birds.</p> <p>(iii) If an EMP is required in accordance with Condition 22(b) for the presence of Threatened or At-Risk wetland birds:</p> <p>A. How the timing of any Construction Works shall be undertaken outside of the bird breeding season (September to February) where practicable;</p> <p>B. Where works are required within the Confirmed Biodiversity Area during the bird season, methods to minimise adverse effects on Threatened or At-Risk wetland birds;</p> <p>C. Undertaking a nesting bird survey of Threatened or At-Risk wetland birds prior to any Construction Works taking place within a 50m radius of any identified wetlands (including establishment of construction areas adjacent to wetlands). Surveys should be repeated at the beginning of each wetland bird breeding season and following periods of construction inactivity;</p> <p>D. What protection and buffer measures will be provided where nesting Threatened or At-Risk wetland birds are identified within 50m of any construction area (including laydown areas). Measures could include:</p> <ol style="list-style-type: none"> i. a 20m buffer area around the nest location and retaining vegetation. The buffer areas should be demarcated where necessary to protect birds from encroachment. This might include the use of marker poles, tape and signage; ii. monitoring of the nesting Threatened or At-Risk wetland birds by a Suitably Qualified Person. Construction works within the 20m nesting buffer areas should not occur until the Threatened or At-Risk wetland birds have fledged from the nest location (approximately 30 days from egg laying to fledging) as confirmed by a Suitably Qualified Person; iii. minimising the disturbance from the works if construction works are required within 50 m of a nest, as advised by a Suitably Qualified Person; iv. adopting a 10m setback where practicable, between the edge of Wetlands and construction areas (along the edge of the stockpile/laydown area); and v. minimising light spill from construction areas into Wetlands. <p>Advice Note:</p> <p><i>Depending on the potential effects of the Project, the regional consents for the Project may include the following monitoring and management plans:</i></p> <ol style="list-style-type: none"> (i) Stream and/or wetland restoration plans; (ii) Vegetation restoration plans; and (iii) Fauna management plans (eg avifauna, herpetofauna, bats).
8	23.	<p>Ecological Management Plan (EMP)</p> <p>(a) An EMP shall be prepared for any Confirmed Biodiversity Areas (confirmed through Condition 22) prior to the Start of Construction for a Stage of Work. The objective of the EMP is to minimise effects of the Project on the ecological features of value of</p>

NoR(s)	No.	Condition
		<p>Confirmed Biodiversity Areas as far as practicable. The EMP shall set out the methods that will be used to achieve the objective which may include:</p> <p>(i) If an EMP is required in accordance with Condition 22(b) for the presence of long tail bats:</p> <ul style="list-style-type: none"> A. Measures to minimise as far as practicable, disturbance from construction activities within the vicinity of any active long tail bat roosts (including maternity) that are discovered through survey until such roosts are confirmed to be vacant of bats. B. How the timing of any construction work in the vicinity of any maternity long tail bat roosts will be limited to outside the bat maternity period (between December and March) where reasonably practicable; C. Details of areas where vegetation is to be retained where practicable for the purposes of the connectivity of long tail bats; D. Details of how bat connectivity will be provided and maintained (e.g. through the presence of suitable indigenous or exotic trees or artificial alternatives); E. Details of measures to minimise operational disturbance from light spill; and F. Details of where opportunities for advance restoration / mitigation planting have previously been identified and implemented. <p>(ii) If an EMP is required in accordance with the Condition 22(b) for the presence of Threatened or At-Risk birds (excluding wetland birds):</p> <ul style="list-style-type: none"> A. How the timing of any Construction Works shall be undertaken outside of the bird breeding season (September to February) where practicable; and B. Where works are required within the area identified in the Confirmed Biodiversity Area during the bird breeding season, methods to minimise adverse effects on Threatened or At-Risk birds. <p>(iii) If an EMP is required in accordance with Condition 22(b) for the presence of Threatened or At-Risk wetland birds:</p> <ul style="list-style-type: none"> A. How the timing of any Construction Works shall be undertaken outside of the bird breeding season (September to February) where practicable; B. Where works are required within the Confirmed Biodiversity Area during the bird season, methods to minimise adverse effects on Threatened or At-Risk wetland birds; C. Undertaking a nesting bird survey of Threatened or At-Risk wetland birds prior to any Construction Works taking place within a 50m radius of any identified Wetlands (including establishment of construction areas adjacent to Wetlands). Surveys should be repeated at the beginning of each wetland bird breeding season and following periods of construction inactivity; D. What protection and buffer measures will be provided where nesting Threatened or At-Risk wetland birds are identified within 50m of any construction area (including laydown areas). Measures could include: <ul style="list-style-type: none"> i. a 20m buffer area around the nest location and retaining vegetation. The buffer areas should be demarcated where necessary to protect birds from encroachment. This might include the use of marker poles, tape and signage; ii. monitoring of the nesting Threatened or At-Risk wetland birds by a Suitably Qualified Person. Construction works within the 20m nesting buffer areas should not occur until the Threatened or At-Risk wetland birds have fledged from the nest location (approximately 30 days from egg laying to fledging) as confirmed by a Suitably Qualified Person; iii. minimising the disturbance from the works if construction works are required within 50 m of a nest, as advised by a Suitably Qualified Person; iv. adopting a 10m setback where practicable, between the edge of Wetlands and construction areas (along the edge of the stockpile/laydown area); and v. minimising light spill from construction areas into Wetlands. <p>(iv) If an EMP is required in accordance with Condition 22(b) for the presence of native lizards:</p>

NoR(s)	No.	Condition
		<p>A. A description of the methodology and timing for survey, trapping and relocation of lizards rescued;</p> <p>B. A description of the relocation site(s), including:</p> <ol style="list-style-type: none"> i. any measures to ensure the relocation site remains available; ii. any weed and pest management to ensure the relocation site is maintained as appropriate habitat. <p>C. A post vegetation clearance search for remaining lizards; and</p> <p>D. Any proposed monitoring.</p> <p>(v) The EMP shall be consistent with any ecological management measures to be undertaken in compliance with conditions of any regional resource consents granted for the Project.</p> <p>Advice Note:</p> <p><i>Depending on the potential effects of the Project, the regional consents for the Project may include the following monitoring and management plans:</i></p> <ol style="list-style-type: none"> (vi) <i>Stream and/or wetland restoration plans;</i> (vii) <i>Vegetation restoration plans; and</i> (i) <i>Fauna management plans (eg avifauna, herpetofauna, bats).</i>
2 and 8	24.	<p>Tree Management Plan</p> <p>(a) Prior to the Start of Construction for a Stage of Work, a Tree Management Plan shall be prepared. The objective of the Tree Management Plan is to avoid, remedy or mitigate effects of construction activities on trees identified in <i>Schedule 3: Trees to be included in the Tree Management Plan</i>.</p> <p>(b) The Tree Management Plan shall:</p> <ol style="list-style-type: none"> (i) confirm that the trees listed in Schedule 3 still exist; and (ii) demonstrate how the design and location of project works has avoided, remedied or mitigated any effects on any tree listed in Schedule 3. This may include: <ol style="list-style-type: none"> A. planting to replace trees that require removal (with reference to the ULDMP planting design details in Condition 10); B. tree protection zones and tree protection measures such as protective fencing, ground protection and physical protection of roots, trunks and branches; and C. methods for work within the rootzone of trees that are to be retained in line with accepted arboricultural standards. (iii) demonstrate how the tree management measures (outlined in A – C above) are consistent with conditions of any resource consents granted for the project in relation to managing construction effects on trees.
2 and 8	25.	<p>Network Utility Management Plan (NUMP)</p> <p>(a) A NUMP shall be prepared prior to the Start of Construction for a Stage of Work.</p> <p>(b) The objective of the NUMP is to set out a framework for protecting, relocating and working in proximity to existing network utilities. The NUMP shall include methods to:</p> <ol style="list-style-type: none"> (i) provide access for maintenance at all reasonable times, or emergency works at all times during construction activities; (ii) protect and where necessary, relocate existing network utilities; (iii) manage the effects of dust and any other material potentially resulting from construction activities and able to cause material damage, beyond normal wear and tear to overhead transmission lines in the Project area; and (iv) demonstrate compliance with relevant standards and Codes of Practice including, where relevant, the NZECP 34:2001 New Zealand Electrical Code of Practice for Electrical Safe Distances 2001; AS/NZS 4853:2012 Electrical Hazards on Metallic Pipelines; and AS/NZS 2885 Pipelines – Gas and Liquid Petroleum. <p>(c) The NUMP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project.</p> <p>(d) The development of the NUMP shall consider opportunities to coordinate future work programmes with other Network Utility Operator(s) where practicable.</p> <p>(e) The NUMP shall describe how any comments from the Network Utility Operator in relation to its assets have been addressed.</p>

NoR(s)	No.	Condition
		<p>(f) Any comments received from the Network Utility Operator shall be considered when finalising the NUMP.</p> <p>(g) Any amendments to the NUMP related to the assets of a Network Utility Operator shall be prepared in consultation with that asset owner.</p>
Operational Conditions		
2 and 8	26.	<p>Low Noise Road Surface</p> <p>(a) Asphaltic mix surface shall be implemented within twelve months of completion of construction of the Project.</p> <p>(b) The asphaltic mix surface shall be maintained to retain the noise reduction performance as far as practicable.</p>
2 and 8		<p>Traffic Noise</p> <p>For the purposes of Conditions 27 to 40:</p> <p>(a) Building-Modification Mitigation – has the same meaning as in NZS 6806;</p> <p>(b) Design year has the same meaning as in NZS 6806;</p> <p>(c) Detailed Mitigation Options – means the fully detailed design of the Selected Mitigation Options, with all practical issues addressed;</p> <p>(d) Habitable Space – has the same meaning as in NZS 6806;</p> <p>(e) Identified Noise Criteria Category – means the Noise Criteria Category for a PPF identified in <i>Schedule [3]²: Identified PPFs Noise Criteria Categories</i>;</p> <p>(f) Mitigation – has the same meaning as in NZS 6806:2010 Acoustics – Road-traffic noise – New and altered roads;</p> <p>(g) Noise Criteria Categories – means the groups of preference for sound levels established in accordance with NZS 6806 when determining the Best Practicable Option for noise mitigation (i.e. Categories A, B and C);</p> <p>(h) NZS 6806 – means New Zealand Standard NZS 6806:2010 Acoustics – Road-traffic noise – New and altered roads;</p> <p>(i) P40 – means Transport Agency NZTA P40:2014 Specification for noise mitigation;</p> <p>(j) Protected Premises and Facilities (PPFs) – means only the premises and facilities identified in green, orange or red in <i>Schedule [3]³: Identified PPFs Noise Criteria Categories</i>; (update to NZS 6806 definition of PPF)</p> <p>(k) Selected Mitigation Options – means the preferred mitigation option resulting from a Best Practicable Option assessment undertaken in accordance with NZS 6806; and</p> <p>(l) Structural Mitigation – has the same meaning as in NZS 6806.</p>
2 and 8	27.	<p>The Noise Criteria Categories identified in <i>Schedule [3]⁴: Identified PPFs Noise Criteria Categories</i> at each of the PPFs shall be achieved where practicable and subject to Conditions 26 to 40 (all traffic noise conditions). <u>In addition, noise to all PPFs shall not exceed the Predicted noise levels for all PPFs in Schedule [x] plus 2dB. Where PPFs are not identified in Schedules (3) or [x], the design shall be in accordance with the Best Practicable Option.</u></p> <p>The Noise Criteria Categories at above criteria the PPFs identified in <i>Schedule [3]⁵: Identified PPFs Noise Criteria Categories</i> do not need to be complied with where:</p> <p>(a) the PPF no longer exists; or</p> <p>(b) agreement of the landowner has been obtained confirming that the Noise Criteria Category level does not need to be met.</p>

² Schedule 3 in NoR 2 Drury – Pukekohe Link and Schedule 4 in NoR 8 Mill Road and Pukekohe East Road Upgrade

³ Schedule 3 in NoR 2 Drury – Pukekohe Link and Schedule 4 in NoR 8 Mill Road and Pukekohe East Road Upgrade

⁴ Schedule 3 in NoR 2 Drury – Pukekohe Link and Schedule 4 in NoR 8 Mill Road and Pukekohe East Road Upgrade

⁵ Schedule 3 in NoR 2 Drury – Pukekohe Link and Schedule 4 in NoR 8 Mill Road and Pukekohe East Road Upgrade ⁶ Schedule 3 in NoR 2 Drury – Pukekohe Link and Schedule 4 in NoR 8 Mill Road and Pukekohe East Road Upgrade

NoR(s)	No.	Condition
		Achievement of the Noise Criteria Categories design criteria for PPFs shall be by reference to a traffic forecast for a high growth scenario in a design year at least 10 years after the programmed opening of the Project. <u>(The above condition will require Appendix A of the Assessment of Operational Noise Effects to be added to the condition set as Schedule [x].)</u>
2 and 8	28.	As part of the detailed design of the Project, a Suitably Qualified Person shall determine the Selected Mitigation Options for the PPFs. identified on Schedule [3]⁶: Identified PPFs Noise Criteria Categories. <u>For the avoidance of doubt, the low noise road surface implemented in accordance with Condition 27 may be (or be part of) the Selected Mitigation Option(s). (unclear if should be in both AT and WK)</u> <u>In situations where the project passes through future residential areas, noise barriers shall be included in the Selected Mitigation Options where they can be demonstrated to provide the Best Practicable Option for the control of road traffic noise having regard to its intended future residential use.</u>
2 and 8	29.	Prior to construction of the Project, a Suitably Qualified Person shall develop the Detailed Mitigation Options for the PPFs. identified in Schedule [3]⁷: Identified PPFs Noise Criteria Categories, taking into account the Selected Mitigation Options. <u>In situations where the project passes through future residential areas, noise barriers shall be included in the Detailed Mitigation Options where they can be demonstrated to provide the Best Practicable Option for the control of road traffic noise having regard to its intended future residential use.</u>
2 and 8	30.	If the Detailed Mitigation Options would result in the Identified Noise Criteria Category changing to a less stringent Category, e.g. from Category A to B or Category B to C, an increase in noise level at any relevant PPF, compared to the design criteria of condition 27, a Suitably Qualified Person shall provide confirmation to the Manager that the Detailed Mitigation Option would be consistent with adopting the Best Practicable Option in accordance with NZS 6806 prior to implementation.
2 and 8	31.	Prior to the Start of Construction, a Noise Mitigation Plan written in accordance with P40 shall be provided to the Manager for information.
2 and 8	32.	The Detailed Mitigation Options shall be implemented prior to completion of construction of the Project <u>and, where practicable and effective, prior to the commencement of construction.</u> with † The exception of is any low-noise road surfaces, which shall be implemented within twelve months of completion of construction.
2 and 8	33.	Prior to the Start of Construction, a Suitably Qualified Person shall identify those PPFs which, following implementation of all the Detailed Mitigation Options, will not be Noise Criteria Categories A or B and where Building-Modification Mitigation might be required to achieve 40 dB L _{Aeq(24h)} inside Habitable Spaces ('Category C Buildings').
2 and 8	34.	Prior to the Start of Construction in the vicinity of each Category C Building, the Requiring Authority shall write to the owner of the Category C Building requesting entry to assess the noise reduction performance of the existing building envelope. If the building owner agrees to entry within three months of the date of the Requiring Authority's letter, the Requiring Authority shall instruct a Suitably Qualified Person to visit the building and assess the noise reduction performance of the existing building envelope.
2 and 8	35.	For each Category C Building identified, the Requiring Authority is deemed to have complied with Condition 34 above if:

⁶ Schedule 3 in NoR 2 Drury – Pukekohe Link and Schedule 4 in NoR 8 Mill Road and Pukekohe East Road Upgrade

⁷ Schedule 3 in NoR 2 Drury – Pukekohe Link and Schedule 4 in NoR 8 Mill Road and Pukekohe East Road Upgrade

NoR(s)	No.	Condition
		<p>(a) The Requiring Authority's Suitably Qualified Person has visited the building and assessed the noise reduction performance of the building envelope; or</p> <p>(b) The building owner agreed to entry, but the Requiring Authority could not gain entry for some reason (such as entry denied by a tenant); or</p> <p>(c) The building owner did not agree to entry within three months of the date of the Requiring Authority's letter sent in accordance with Condition 34 above (including where the owner did not respond within that period); or</p> <p>(d) The building owner cannot, after reasonable enquiry, be found prior to completion of construction of the Project.</p> <p>If any of (b) to (d) above apply to a Category C Building, the Requiring Authority is not required to implement Building-Modification Mitigation to that building.</p>
2 and 8	36.	<p>Subject to Condition 35 above, within six months of the assessment undertaken in accordance with Conditions 34 and 35, the Requiring Authority shall write to the owner of each Category C Building advising:</p> <p>(a) If Building-Modification Mitigation is required to achieve 40 dB L_{Aeq(24h)} inside habitable spaces; and</p> <p>(b) The options available for Building-Modification Mitigation to the building, if required; and</p> <p>(c) That the owner has three months to decide whether to accept Building-Modification Mitigation to the building and to advise which option for Building-Modification Mitigation the owner prefers, if the Requiring Authority has advised that more than one option is available.</p>
2 and 8	37.	<p>Once an agreement on Building-Modification Mitigation is reached between the Requiring Authority and the owner of a Category C Building, the mitigation shall be implemented, including any third party authorisations required, in a reasonable and practical timeframe agreed between the Requiring Authority and the owner.</p>
2 and 8	38.	<p>Subject to Condition 35, where Building-Modification Mitigation is required, the Requiring Authority is deemed to have complied with Condition 37 if:</p> <p>(a) The Requiring Authority has completed Building Modification Mitigation to the building; or</p> <p>(b) An alternative agreement for mitigation is reached between the Requiring Authority and the building owner; or</p> <p>(c) The building owner did not accept the Requiring Authority's offer to implement Building-Modification Mitigation within three months of the date of the Requiring Authority's letter sent in accordance with Condition 35 (including where the owner did not respond within that period); or</p> <p>(d) The building owner cannot, after reasonable enquiry, be found prior to completion of construction of the Project.</p>
2 and 8	39.	<p>Within twelve months of completion of construction of the Project, a post-construction review report written in accordance with P40 Specification for Noise Mitigation 2014 shall be provided to the Manager.</p>
2 and 8	40.	<p>The Detailed Mitigation Options shall be maintained so they retain their noise reduction performance as far as practicable.</p>

Note the Schedules that were included with the NoR are unaltered but have been removed from this copy.

