



Environmental  
Protection Authority  
*Te Mana Rauhi Taiao*

---

## ANALYSIS OF SUBMISSIONS

---

# East West Link Proposal

April 2017 (Version 3)



## Executive Summary

On 16 December 2016, the New Zealand Transport Agency (Transport Agency) lodged an application for two notices of requirement and 23 resource consents with the Environmental Protection Authority (EPA) for the construction, operation, and maintenance of the East West Link proposal (the Proposal).

The Hon Dr Nick Smith, Minister for the Environment, and the Hon Maggie Barry, Minister of Conservation, directed the Proposal to be heard and decided by a Board of Inquiry (Board) as a proposal of national significance on 8 February 2017.

The EPA publically notified the Proposal and the Minister's direction on 22 February 2017 and called for submissions. The submissions period closed on 22 March 2017.

The EPA received:

- 685 submissions before the close of the submission period; and
- four late submissions.

We are seeking direction from the Board of Inquiry (the Board) on the late submissions and they have not been included within this report.

Of the 685 submissions received by the EPA by the close of submissions:

- 582 submitters (85%) oppose the proposal in full, or in part
- 94 submitters (13.7%) support the proposal in full, or in part
- nine submitters (1.3%) indicated they were neutral toward the proposal.

Wish to be heard:

- 356 submitters (52%) have indicated that they wish to be heard at the hearing.

## Table of Contents

<b>Executive Summary</b> .....	<b>1</b>
<b>Table of Contents</b> .....	<b>2</b>
<b>1 Explanatory Information</b> .....	<b>4</b>
1.1 Use of this document .....	4
1.2 Administration.....	4
1.2.1 Limitations .....	5
1.2.2 Web-based third-party submission form .....	5
1.2.3 Submitters wishing to be heard.....	5
<b>2 Introduction</b> .....	<b>6</b>
2.1 Proposal Background.....	6
2.2 Public Notification.....	6
<b>3 Submissions Received</b> .....	<b>7</b>
3.1.1 Submissions lodged directly with the EPA.....	8
3.1.2 Submissions lodged on the third-party web-based form.....	8
<b>4 Overview of Submissions</b> .....	<b>8</b>
4.1 Position of submitters on the proposal .....	8
4.2 Decision sought on the proposal by submitters .....	8
4.3 Trade Competition.....	8
<b>5 Trends observed in submissions</b> .....	<b>9</b>
5.1 Submitters wishing to be heard.....	9
5.2 Submissions by location.....	9
5.2.1 Submissions by suburb .....	9
5.2.2 Submissions by city.....	10
5.3 Submissions by sector .....	10
<b>6 Submission subjects and themes</b> .....	<b>11</b>
6.1 Access concerns .....	12
6.2 Consideration of alternatives.....	12
6.3 Noise and vibration .....	13
6.4 Visual amenity and character effects .....	14
6.5 Social and community wellbeing .....	15
6.6 Consultation .....	15
6.7 Air quality and pollution .....	16

6.8	Traffic and transport .....	16
6.9	Economic effects .....	18
6.10	Ecological impacts .....	19
6.11	Cultural Impacts .....	20
6.12	Pedestrian and cycle .....	21
6.13	Third-party submission form subjects and themes .....	22
6.14	Other themes raised.....	23
<b>7</b>	<b>Conditions Requested .....</b>	<b>23</b>
	<b>Appendix 1: Submissions by alphabetical order.....</b>	<b>24</b>
	<b>Appendix 2: Submissions by numerical order.....</b>	<b>25</b>
	Table 1. Submitters who wish to be heard by position .....	9
	Table 2: Submissions by Auckland suburb .....	10
	Table 3: Submissions by city.....	10
	Table 4: Submissions by sector .....	11
	Table 5: Common issues and concerns raised in submissions .....	11

#### Document revisions:

Version 3 – 13 April 2017 - minor edits and corrections

Version 2 – 7 April 2017 - minor edits and corrections

Version 1 – 3 April 2017

# 1 Explanatory Information

## 1.1 Use of this document

The purpose of this report is to assist the Board and parties to the board of inquiry process. The report is broken down as follows:

- |            |   |
|------------|---|
| Section 1  | Outlines the purpose, structure, and limitations of this report.  |
| Section 2  | Provides background on the Proposal and the submission process.   |
| Section 3  | Provides information regarding the submissions received, including the number of submissions received.  |
| Section 4  | Provides a general overview of the positions of submitters, and the decisions sought by submitters.   |
| Section 5  | Identifies trends within submissions, including the number of submitters that wish to be heard at the hearing, where submitters are located, whether submitters are individuals, groups, or organisations and whether submitters are trade competitors. |
| Section 6  | Contains a summary of the types of matters raised across a number of submissions. This section discusses submissions lodged directly with the EPA, and the web-based, third-party submission form.  |
| Section 7  | Summarises specific conditions sought by submitters.  |
| Appendix 1 | Index of submitters alphabetically  |
| Appendix 2 | Index of submitters numerically   |

## 1.2 Administration

Each submitter is referenced by either their organisation name, or both their surname(s), and first initial(s). Each submitter has also been assigned an EPA submitter reference number for administrative purposes.

This analysis of submissions provides an overview of the submissions received, and outlines the general opinions provided in these submissions. The themes described within this report reflect the views represented by submitters, and do not reflect any view of the EPA. Italics have been used to highlight where comments reflect submitters opinion.

### 1.2.1 Limitations

Identification of trends and concerns within this report are based on information provided by submitters in their written submissions, and taking into account any changes requested by submitters following close of submissions, and up to 3 April 2017.

For the purpose of Sections 4 and 5 of this report, if a submitter has indicated a position either 'in full' or 'in part', they have been described as 'generally opposing' or 'generally supporting' the proposal. The categorisation of submitters into "sectors" in Section 5 of this report is based on the "submitter name" provided on the submission form, and does not reflect if an individual submission refers to businesses, or other types of groups, in their submission.

It is not unusual for submissions received on proposals of this nature to cover a broad range of issues and offer differing levels of detail. Although each submission is unique, an analysis of the submissions necessarily involves a degree of generalisation. Summaries of matters raised and conditions proposed are therefore not a replication of original submissions.

The trends and common matters raised and summarised in Section 6 are based solely on the content of submissions. The analysis contains only matters raised across a number of submissions and may not refer to all matters raised.

### 1.2.2 Web-based third-party submission form

Of the 685 total submissions received, 419 (61.2%) were received by the EPA via email that were submitted using a third-party website which hosted a pre-populated, EPA-branded submission form (that was not endorsed or encouraged by the EPA).

The part of the submission form that requests reasons for their opinion contained standard wording, which could not be edited by the submitter. However, submitters were able to unselect individual points if they chose to.

### 1.2.3 Submitters wishing to be heard

With regards to the number of submitters who wish to be heard at the hearing. The EPA provides all submitters who expressed this view, with the opportunity to confirm their wish to be heard at a hearing before the hearing notice is released, thus the number who want to be heard at the hearing could decrease.

## 2 Introduction

### 2.1 Proposal Background

On 16 December 2016, the Transport Agency lodged an application for two notices of requirement and 23 resource consents with the EPA for the construction, operation, and maintenance of the Proposal.

The Proposal is for the construction, operation, and maintenance of a new state highway and associated works between State Highway 20 (SH20) in Onehunga, and State Highway 1 (SH1) in Mt Wellington (the East West Link Main Alignment). There are also associated works on SH1 between Mt Wellington and the Ōtāhuhu Interchange at Princes Street.

The application consists of the following:

- A new four lane arterial road between the existing SH20 Neilson Street Interchange in Onehunga and SH1 at Mt Wellington; and connection of the new arterial road to SH1 via two new ramps south of Mt Wellington Interchange;
- The widening of SH1 and an upgrade of the Princes Street Interchange;
- Reconfiguration of the Neilson Street Interchange and surrounding roads including a trench on the southern side of the interchange, with a local bridge connecting Onehunga Harbour Road to Onehunga Wharf;
- New commuter and recreational cycle paths along the East West Link connecting into the local Onehunga, Penrose and Sylvia Park communities, and a new pedestrian and cycle connection across Ōtāhuhu Creek;
- New local road connections to and from the East West Link Main Alignment; and local road improvements including extensions to Galway Street, Captain Springs Road and Hugo Johnston Drive;
- A new grade separated intersection at Great South Road/Sylvia Park Road;
- Reclamation of part of the Coastal Marine Area (CMA) along the northern foreshore of Māngere Inlet to construct parts of the East West Link Main Alignment, and to construct stormwater treatment areas, headlands to form a naturalised coastal edge, and recreational space.

### 2.2 Public Notification

The East West Link proposal was publicly notified on Wednesday 22 February 2017. The public notice was published in the New Zealand Herald, The Dominion Post, The Press, and The Otago

Daily Times. A condensed version of the public notice was also placed in the Central Leader, the Manukau Courier, and the Onehunga Community News, on 22, 23 February, and 2 March, respectively.

The EPA identified 2400 owners and occupiers of properties within, and adjoining the proposal area who each received “direct notification” of the proposal. The EPA’s direct notification pack included a copy of the public notice, an informative cover letter, and a flyer advertising the independent Friend of Submitter service.

Copies of the application, public notice, submission form, information sheets, non-technical summary (provided by Transport Agency) and flyers advertising the independent Friend of Submitter service were made available on the EPA website and at the following locations:

- EPA Head Office, Level 10, 215 Lambton Quay, Wellington
- Graham Street Service Centre – 35 Graham Street, Auckland
- Onehunga Library – 85 Church Street, Onehunga, Auckland
- Mangere Bridge Library – 5/7 Church Road, Mangere Bridge, Auckland
- Otahuhu Library – 28/30 Mason Avenue, Otahuhu, Auckland
- Central City Library – 44/46 Lorne Street, Auckland

Submissions could be made via the EPA’s online submission form, by email, or by hard copy delivered by post, email, or delivered in person to the EPA.

As per section 149E of the RMA, the submission period ran for 20 working days and ended at 5:00pm on 22 March 2017.

### 3 Submissions Received

At the close of submission period on 22 March 2017 the EPA had received 685 submissions, including 491 submissions using the third party submission form.

This includes submissions the EPA received by post that were date stamped on or before the day of submissions close, as well as submissions that were incomplete when first received (where the EPA was able to contact the submitter and additional information was provided by the submitter before the close of the submission period).

As at 5pm 3 April 2017, the EPA had also received four late submissions. These have been passed to the Board who will make the decision whether to grant a waiver to accept late submissions. As we are still seeking direction from the Board on the late submissions, they have not been included within this report.



### 3.1.1 Submissions lodged directly with the EPA

Of the 685 submissions received by the EPA, 266 (38.8%) were provided on either the EPA submission form, or directly to the EPA via email, or post. A number of these submissions included attachments with supplementary information.

### 3.1.2 Submissions lodged on the third-party web-based form

Due to the considerable number of submissions being made on this pro-forma submission form, the themes described in these have been discussed separately to the remaining submissions in Section 6.13 of this report.

## 4 Overview of Submissions

Submitters were asked a number of standard questions where they were requested to indicate their position by using the check boxes in the submission form. These responses are outlined below.

### 4.1 Position of submitters on the proposal

The submission form asked submitters to indicate whether they support, oppose, or are neutral with regard to their view on the proposal.

- 582 submitters (85%) **oppose** the Proposal either in full or in part
- 94 submitters (13.7%) **support** the Proposal either in full or in part
- nine submitters (1.3%) are **neutral** toward the proposal

### 4.2 Decision sought on the proposal by submitters

Submitters were asked to indicate the decision they would like the Board to make on the proposal.

- 521 submitters (76.1%) would like the Board to **decline** the proposal
- 41 submitters (6%) would like the Board to **approve** the proposal
- 114 submitters (16.6%) would like the Board to **approve** the proposal **with conditions**
- nine submitters (1.3%) indicated they have **no view** on the decision they would like the Board to make

### 4.3 Trade Competition

Submitters were asked to indicate whether they considered that they are Trade Competitors of the Transport Agency. Nine submitters considered that they are trade competitors of the Transport Agency. These submitters are: J Hughes (Submission No. 126025), R Dibley (Submission No.

126120), M F & J K Khan (Submission No. 126139), G Page (Submission No. 126227), S Hood (Submission No. 126231), S Bateman (Submission No. 126248), R Lacey (Submission No. 126249), W Wallace-Warahi (Submission No. 126266), and D Benson (Submission No. 126361).

## 5 Trends observed in submissions

### 5.1 Submitters wishing to be heard

Three hundred and fifty five submitters (51.8%) indicated in their submission that they wish to be heard at the hearing. The table below identifies the proportion of submitters who wish to be heard according to their position on the application.

The EPA provides all submitters who expressed this view, with the opportunity to confirm their wish to be heard at a hearing before the hearing notice is released, thus the number who want to be heard at the hearing could decrease.

**Table 1. Submitters who wish to be heard by position**

Position	Number of submissions	Percentage	Wish to be heard	
			Yes	No
Oppose in full	472	68.9%	55.7%	44.3%
Oppose in part	110	16.1%	36.3%	63.6%
Support in full	54	7.9%	55.6%	44.4%
Support in part	40	5.8%	37.0%	63%
Neutral	9	1.3%	67.5%	32.5%

### 5.2 Submissions by location

#### 5.2.1 Submissions by suburb

Table 2 identifies the submitters from surrounding suburbs and indicates the percentage of submitters from each suburb that supported, opposed, or were neutral toward the proposal. The majority of submitters are from the general proposal area. Over a third of these 224 submitters identified as being from Onehunga. Of these, 88.3% opposed the proposal.

67.3% of submitters did not specify their location in their submission. The key reason for this is because the third-party submission form did not include a section for a physical address.

**Table 2: Submissions by Auckland suburb**

Location	Number of submissions	Percentage	Position		
			Support	Oppose	Neutral
Onehunga	77	11.2%	11.7%	88.3%	0%
Mangere Bridge	13	1.9%	0%	100%	0%
Royal Oak	9	1.3%	0%	100%	0%
Hillsborough	8	1.2%	25%	75%	0%
Otahuhu	8	1.2%	25%	75%	0%
Penrose	7	1.0%	42.9%	57.1%	0%
All other Auckland suburbs	94	13.7%	40.4%	58.5%	1.1%
Other/Unspecified	469	68.5%	8.5%	89.7%	1.7%

### 5.2.2 Submissions by city

Table 3 indicates the percentage of submitters from each area that supported, opposed, or were neutral toward the proposal. Of those who provided a physical address in the submission form, the majority of submitters have identified as being from Auckland (216 submitters, 96.4%).

**Table 3: Submissions by city**

Location	Number of submissions	Percentage	Position		
			Support	Oppose	Neutral
Auckland	216	31.5%	25%	74.5%	0.5%
Other North Island	7	1%	57.1%	14.3%	28.6%
South Island	1	0.1%	0%	100%	0%
Other / not specified	461	67.3%	7.8%	90.9%	1.3%

## 5.3 Submissions by sector

The following Table 4 identifies the submitters from each sector in terms of who supports the Proposal, opposes the Proposal, and who is either neutral or have mixed views. The majority of submissions are from individuals (80.9%) followed by businesses, business groups and trusts (12.6%). The number of submissions from iwi and the public sector is also noteworthy.

**Table 4: Submissions by sector**

Sector	Number of submissions	Percentage	Position		
			Support	Oppose	Neutral or mixed
Individuals	554	80.9%	7.9%	91.3%	0.7%
Businesses, business groups and trusts	86	12.6%	35%	55.8%	3.5%
Community and advocacy groups	24	3.5%	16.7%	83.3%	0.0%
Iwi and other cultural groups	10	1.5%	60.0%	30.0%	10.0%
Councils and other government agencies	7	1.0%	71.4%	14.3%	14.3%
Body Corporates	4	0.6%	0.0%	100%	0.0%

## 6 Submission subjects and themes

The themes discussed in this section are those relating to the submissions lodged directly with the EPA only, totalling 266 submissions. Themes discussed in the web-based, third-party submission form are discussed in the following section.

**Table 5: Common issues and concerns raised in submissions**

Topic	Number of submitters referring to topic	Percentage (total = 266)
Access concerns and comments	124	46.6%
Consideration of alternatives	119	44.7%
Noise and vibration	99	37.2%
Visual amenity and character effects	93	35.0%
Social and community wellbeing	74	27.8%
Consultation	73	27.4%
Air quality and pollution	70	26.3%
Traffic congestion	69	25.9%
Economic effects	69	25.9%
Ecology, marine ecology and the foreshore	68	25.6%
Pedestrian and cycle, shared paths	31	11.7%
Cultural impacts	34	12.8%

## 6.1 Access concerns

One hundred and twenty four submitters (46.6%) identified access concerns relating to the proposal. Of these, 72.6% submitters generally opposed the proposal, while 26.6% generally supported the proposal and one submitter was neutral toward the proposal. Access concerns related mainly to severance, environmental separation, and private access.

Some of the themes discussed by submitters are described below:

Positive:

- *The proposal will enhance connectivity for commercial and industrial activities within the surrounding area.*

Negative:

- *Severance along all coastal edges of the East West Link. The alignment severs Onehunga from the Mangere Inlet, and increases isolation of the Manukau Harbour Foreshore, Te Hopua Tuff Ring, and Onehunga Wharf.*
- *The loss of environmental separation between the road and the cycle and shared paths which led to perceived safety and health risks.*
- *Submitters had concerns regarding specific private access, for example, a westbound right turn into 8 Sylvia Park Road, Onehunga Mall cul-de-sac residents.*
- *The proposal increases the severance between Onehunga Town Centre and the Onehunga foreshore and Onehunga Port area.*
- *The proposal fails to recognise the significance of the Onehunga Port and surrounding waterfront to the Onehunga community. Adequate provision should be provided to ensure public access to this coastal environment.*
- *There will be a loss of access to Gloucester Park, including for the Aotea Sea Scouts.*

The following submissions provide a representative view in relation to access concerns: 8 Sylvia Park Road Body Corporate (Submission No. 126453), Onehunga Mall Cul-de-sac Residents (Submission No. 126458), Stirrup, T. (Submission No. 126057), Smith, D. (Submission No. 126330), Palmer, G. (Submission No. 126133), Scouts Association of New Zealand – Aotea Sea Scout Group (Submission No. 126212). This is not a complete list of submitters that had general and specific views on this theme. The Board will consider all submissions.

## 6.2 Consideration of alternatives

One hundred and nineteen submitters (44.7%) raised concerns with regard to the consideration of alternatives of the proposal. Of these, 73.9% generally opposed the proposal, while 26.1% of submitters generally supported the proposal.

Submitters with concerns around the consideration of alternatives expressed the following opinions:

- *Alternatives have not been appropriately considered and the desired traffic impacts could be achieved with a design that does not require a highway along the coast.*
- *The Onehunga Enhancement Society (TOES) proposed community plan is preferred to the Transport Agency plan.*
- *Neilson Street upgrades were suggested as a preferred idea that would not result in two large roads running parallel to each other.*
- *A different option posed by the Transport Agency (Option 2 Grade Separated Continuous Structure) was preferred over the selected option.*
- *Many submitters suggested that a new road was not the solution Auckland required, and light rail should be considered instead.*

The following submissions provide a representative view in relation to the consideration of alternatives: Grove Hardware Limited, Grove Enterprises Limited, and Stone Store Properties Limited (Submission No. 126240), Jackson Electrical Industries Limited (Submission No. 126349), Organ Piano and Keyboard Society of Auckland Inc. (Submission No. 126114), Carr, J. (Submission No. 126252), To, C. (Submission No. 126026), Sloan, M. (Submission No. 126031), Wackrow, T & D (Submission No. 126234), Ward Demolition Limited (Submission No. 126343). This is not a complete list of submitters that had general and specific views on this theme. The Board will consider all submissions.

### 6.3 Noise and vibration

Ninety-nine submitters (37.2%) discussed noise and vibration in their submission. Of these, 75.8% of submitters generally opposed the proposal and 24.2% generally supported the proposal.

With regards to noise and vibration, submitters raised concerns for both construction impacts, and on-going impacts of the East West Link. There were submitters who generally supported the proposal who expressed concerns regarding noise and vibration also.

Submitters who commented on noise and vibration discussed the following:

- *A description of the nature and degree of effects of vibration on workplaces and residences should be provided.*
- *The proposal should address the potential for vibration to affect sensitive activities along the route.*
- *A description of the potential effects of the current design so that affected people can be fully informed of the likely adverse effects that will be generated.*
- *Construction vibration could cause damage to sensitive activities along the proposed route, and potentially cause fatal manufacturing flaws for some products in surrounding companies.*

- *The increase in traffic volumes will lead to increased exposure to noise and motor pollutants.*
- *Additional noise is anticipated as the proposed will encourage more heavy vehicles to use State Highway 20.*

The following submissions provide a representative view in relation to noise and vibration: 8 Sylvia Park Road Body Corporate (Submission No. 126453), Rich, K. (Submission No. 126542), Onehunga Mall Cul-de-sac Residents (Submission No. 126458), Maggs, A. (Submission No. 126059), Walker, P. (Submission No. 126307), Woodger, A. & Hazera, E. (Submission No. 126654), Auckland Council (Submission No. 126336). This is not a complete list of submitters that had general and specific views on this theme. The Board will consider all submissions.

## 6.4 Visual amenity and character effects

Ninety-three submitters (35%) discussed visual amenity and character effects in their submission. Of these, 72% generally opposed the proposal and 28% generally supported the proposal.

The following topics were covered in submissions:

- *The existing pathway, as it is, is a pleasant place to enjoy the amenity of the area whereas the proposed pathway will be alongside a large road.*
- *Submitters have commented that the visual impacts will have negative effects due to 'lack of suitable road screening' and 'negative visual impacts on this area of the coastline due to the nature and large scale of the project.'*
- *Submitters have commented on the need for their current building signage to remain visible to users of the road network, and that the road will hide, or reduce visibility of their sites.*
- *There will be a requirement for heavy planting to screen visual pollution from the northern shoreline of the Mangere Inlet.*
- *The Transport Agency has not provided sufficient photo simulations in the application documents.*

The following submissions provide a representative view in relation to visual amenity and character effects: Carr, J. (Submission No. 126252), Walbridge, L. A. (Submission No. 126146), Mahoney, E. (Submission No. 126175), Bateman, R. (Submission No. 126182), Skilton, C. (Submission No. 126201), Oliver, W (Submission No. 126328), Fonterra Brands – Tip Top NZ (Submission No. 126357), Bosson, T. (Submission No. 126135), Jackson Electrical Industries Limited (Submission No. 126349). This is not a complete list of submitters that had general and specific views on this theme. The Board will consider all submissions.

## 6.5 Social and community wellbeing

Seventy-four submitters (27.8%) raised concerns around the implications on social and community wellbeing that may result from the proposal. Of these, 74.3% generally opposed the proposal, while 25.7% generally supported the proposal.

These concerns were in relation to a number of sub-themes, described below:

- *Personal concerns regarding personal, or group, well-being e.g. for 'highly sensitive receivers such as the residents of Onehunga Mall cul-de-sac.*
- *Loss of recreational value for the Onehunga community in the area surrounding the East West Link.*
- *Negative impact on current and future open space*
- *The proposal fails to recognise the value of the Onehunga Port and the surrounding area to the community and will have a negative impact on identity, place-making, and sense of place.*
- *There may be an impact on the ambience and amenity of Waikaraka Cemetery as a place of remembrance, contemplation, and spiritual value.*
- *The proposal does not adequately enable use of the Gloucester Park area.*
- *There is an anticipated intensification of dwellings in the area which will result in a population increase in the community and a subsequent increase in the need for public open spaces and recreational sites. The proposed Gloucester Park interchange will negatively impact this.*

The following submissions provide a representative view in relation to social and community wellbeing: The Campaign for Better Transport Inc. (Submission No. 126255), Onehunga Mall Cul-de-sac Residents (Submission No. 126458), Auckland Council (Submission No. 126336). This is not a complete list of submitters that had general and specific views on this theme. The Board will consider all submissions.

## 6.6 Consultation

Seventy-three submitters discussed the Transport Agency's consultation in their submission. Of these, 78.1% generally opposed the proposal, 20.5% generally supported the proposal, and one submitter indicated they were neutral toward the proposal. Although there was a general concern about the adequacy of consultation undertaken by the Transport Agency, some individuals and groups indicated that they felt they had been well engaged in the process.

Comments regarding consultation included:



Positive:

- *Submitters commented that they felt they were included in good engagement with the Transport Agency throughout the process, over several years.*

Negative:

- *The Transport Agency failed to engage in good faith with stakeholders, community groups, and other agencies.*
- *The early plans were poorly detailed and did not provide an adequate timeframe for when the proposed work would begin.*

The following submissions provide a representative view in relation to consultation: Aotea Sea Scout Group (Submission No. 126212), Ngati Tamaoho (Submission No. 126362), Buklijas, T. (Submission No. 126210), Auckland Heliport Limited Partnership (Submission No. 126324). This is not a complete list of submitters that had general and specific views on this theme. The Board will consider all submissions.

## 6.7 Air quality and pollution

Seventy submitters (26.3%) discussed air quality and pollution in their submission. Of these, 81.4% generally opposed the proposal and 18.6% generally supported the proposal.

Subjects discussed include:

- *The proposal will introduce air pollution to the environment from the additional traffic, a large amount of which will be from the most polluting heavy diesel vehicles.*
- *The increased atmospheric pollution will impact residents physically and mentally.*
- *The increase in vehicles resulting from the proposal will create more pollution and CO2 emissions when authorities should be trying to minimise greenhouse gas emissions.*

The following submissions provide a representative view in relation to air quality and pollution: Russell, A. (Submission No. 126216), Carroll, J. (Submission No. 126132), Smith, D. (Submission No. 126330). This is not a complete list of submitters that had general and specific views on this theme. The Board will consider all submissions.

## 6.8 Traffic and transport

Sixty-nine submitters (25.9%) raised the theme of traffic and transport relating to the proposal. Of these, 75.4% of submitters generally opposed the proposal, while 23.2% generally supported the proposal, and one submitter was neutral toward the proposal.

With regards to traffic and transport there were a mixture of positive and negative issues raised which are described below, according to sub-themes.

Traffic congestion (positive):

- *The proposal will improve connectivity between State Highways 1 and 20, and the Onehunga-Penrose industrial area through a reduction in traffic congestion, reduced travel times, and improved freight movements.*
- *There will be improvements to current traffic congestion on the existing street system with much of the heavy traffic diverted to the East West Link.*

Traffic congestion (negative):

- *The East West Link will create additional traffic flows and congestion on local and arterial roads, with the increased number of vehicles accessing the area to use the new highway and will exacerbate traffic problems for non-freight traffic.*
- *The proposed is not the best way to deal with congestion and is relocation of existing congestion to a different area.*
- *There will be no direct link between the East West Link and the South Eastern Highway so vehicles will need to leave these highways and use the local and arterial road network to travel between them.*
- *The assumptions and modelling regarding improved journey times arising from the new road network are flawed because they have failed to acknowledge the impact of latent demand (i.e. once additional capacity is added to a road network, the demand that had been latent will materialise as actual usage).*

Heavy and over-dimension vehicles:

- *Given the industrial nature of the local area and the focus on improved freight efficiency, there is no analysis regarding adequate access for over dimension vehicles along the proposed East West Link and a lack of clarity regarding the routes available to High Productivity Motor Vehicles and over dimension vehicles.*
- *Elements of the design around State Highway 20 and the Galway Link require reconsideration, particularly for heavy vehicles, and the limited clearance around State Highway 20, and the limited queuing space between intersections.*

Great South Road intersection:

- *With regards to the grade separation of the Great South Road intersection, the application will result in some loss of amenity for local traffic, particularly in relation to the Hugo Johnston Drive intersection.*

#### Parking:

- *There is not sufficient information to confirm that the residual parking provision will be sufficient for the operation of the network or to serve commercial users or recreational users of the foreshore.*
- *The proposed car parking area above Anns Creek is an unnecessary visual intrusion and may pose a security risk due to its remoteness.*

#### Other:

- *The assumptions regarding improved journey times arising from the new road network are flawed because they have failed to acknowledge the impact of latent demand (i.e. once additional capacity is added to a road network, the demand that had been latent will materialise as actual usage).*

The following submissions provide a representative view in relation to traffic and transport: Auckland Council (Submission No. 216336), Kiwi Property Group and Sylvia Park Business Centre Ltd (Submission No. 126492), Tram Lease Limited (Submission No. 126484), To, C. (Submission No. 126026), Bateman, R. (Submission No. 126182), Organ Piano and Keyboard Society of Auckland Inc. (Submission No. 126114). This is not a complete list of submitters that had general and specific views on this theme. The Board will consider all submissions.

## 6.9 Economic effects

The economic effects of the proposal were raised by 69 submitters (25.9%). Of these, 75.4% generally opposed the proposal, while 23.2% generally supported the proposal, and one submitter was neutral toward the proposal.

Submitters who discussed economic effects expressed the following opinions:

- *Economic benefits will result from time savings in travel across the network.*
- *An analysis of the economic benefits is required to understand the full extent of the cost benefits of the proposal, especially given the Detailed Business Case was prepared prior to the proposed option being selected. This point was made by submitters both in support of, and opposing the proposal.*
- *As a result of land required for the new road, land area used by a submitter to undertake their work will be insufficient to satisfactorily operate the business in its current form.*
- *The proposed East West Link is very expensive and carries no proven economic benefits, whereas some alternatives are more acceptable from both an environmental and economic point-of-view.*

The following submissions provide a representative view in relation to economic effects: Downer New Zealand Limited (126334), The Campaign for Better Transport Inc. (126255). This is not a complete

list of submitters that had general and specific views on this theme. The Board will consider all submissions.

## 6.10 Ecological impacts

Sixty-eight submitters (25.6%) discussed ecological impacts in their submission. Of these, 70.6% generally opposed the proposal and 27.9% generally supported the proposal, and one submitter was neutral toward the proposal.

Submitters who commented on ecological impacts discussed the following:

Birds:

- *The provision of greater accessibility to the coastal marine area in the Mangere Inlet will have an adverse impact the ecology of the marine environment and could be at the expense of other values, such as disturbance of bird habitat.*
- *There will be adverse effects on birds in the area. The removal of intertidal habitat which is foraging ground for sea and shore bird species will have significant adverse effects on a number of coastal bird species, as will the loss of roosting habitat on the northern coastal margin of the Mangere Inlet. The proposed coastal boardwalk will cause disturbance and displacement of foraging waders, herons and waterfowl over an additional 14 ha of intertidal foraging habitats.*
- *There will be significant environmental effects on valuable intertidal areas, mangroves, salt marsh, and wading bird habitat in Mangere Inlet.*
- *Bird communities will be displaced from feeding and roosting areas as a result of the proposed boardwalk.*

Vegetation and habitat:

- *There will be significant impacts on remnant habitat in Anns Creek which is so unique that it will be difficult to mitigate or offset the effects.*
- *The lava flow vegetation, volcanic boulderfields, and pahoehoe lava flows within the proposal area represent a unique and unusual assemblage of native plants that are uncommon in Auckland.*
- *There will be loss of and adverse effects on, the lava shrubland, loss of elements of the ecotone sequence, potential damage to freshwater seep zone, and mangrove communities.*
- *The transport problems in the Onehunga/Penrose area do not justify spending such a large amount of money and destroying ecologically sensitive and culturally valuable land around Hopua explosion crater, the tuff ring, the Manukau foreshore, and Anns Creek.*

#### Coastal Processes:

- *There will be an improvement to the health of the Mangere Inlet and consequently the Manukau Harbour through improved stormwater management.*
- *Some submitters comment that the proposal provides for a contaminated containment bund that will reduce pollutants reaching the harbour.*
- *The proposed East West Link is not in line with the objectives and policies of Auckland Councils Regional Policy Statement that requires that any development of Auckland Coastal Environment are of an appropriate form and take into account the values of the coastal environment.*
- *The proposal has not succeeded in minimising its footprint within the coastal environment around the Gloucester Park interchange.*
- *Submitters discuss the Mangere Inlet with regards to dredging and resuspension, and erosion.*
- *The proposal will have adverse effects on sediment movement and build-up in the harbour and will reduce the hydrological flushing of the inlet.*

#### Reclamation:

- *The proposed reclamation is not in keeping with the New Zealand Coastal Policy Statement that states that we should avoid reclamation of land in the coastal marine area (CMA) unless: land outside the CMA is not available for the proposed activity; the activity can only occur in or adjacent to the CMA; there are no practicable alternative methods; and the reclamation will provide significant regional or national benefit.*
- *The reclamation and construction of the road will result in the permanent loss of over 18 hectares of coastal marine area (CMA), a number of areas of indigenous vegetation on lava flows and permanent impacts on Anns Creek East, including the loss of intertidal habitat and impacts on rare flora.*

The following submissions provide a representative view in relation to ecological impacts: Auckland Council (Submission No. 126336), Law, D (Submission No. 126247), Department of Conservation (Submission No. 126404), Read, E. (Submission No. 126325), Otahuhu Cultural Society (Submission No. 126232), Carr, J. (Submission No. 126252), Jackson Electrical Industries Limited (Submission No. 126349), Prasad, R. (Submission No. 126353). This is not a complete list of submitters that had general and specific views on this theme. The Board will consider all submissions.

## 6.11 Cultural Impacts

Thirty-four (12.8%) of submitters discussed cultural impacts in their submission. Of these, 76.5% of submitters generally opposed the proposal, 20.6% generally supported the proposal, and one submitter was neutral toward the proposal.

Submitters who commented on cultural impacts discussed the following:

- *The project failed to appropriately consider the recommendations for restoration and remediation to restore the Manukau from the Waitangi Tribunal on the Manukau (Wai-8).*
- *The Treaty of Waitangi has not been fully considered in this project, especially with regard to its impact on future settlement claim negotiations over the Manukau Harbour with the Crown.*
- *The East West Link has the potential to result in significant adverse cultural effects because of the physical works required within and adjacent to culturally important sites, waters, and areas.*

The following submissions provide a representative view in relation to cultural impacts: Aotea Sea Scout Group (Submission No. 126212), Palmer, G. (Submission No. 126133), Te Akitai Waiohau Taua Society (Submission No. 126332), Te Kawerau a Maki (Submission No. 126364). This is not a complete list of submitters that had general and specific views on this theme. The Board will consider all submissions.

## 6.12 Pedestrian and cycle

Thirty-one (11.7%) of submitters discussed pedestrian and cycle facilities relating to the proposal. Of these, 71% generally opposed the proposal, while 25.8% generally supported the proposal, and one submitter indicated they were neutral toward the proposal.

With regards to pedestrian and cycle facilities there were a mixture of positive and negative issues raised which are described below:

- *The implications of changing traffic composition and speeds for pedestrian and cycle traffic have not been described enough.*
- *Pedestrian and cycle routes at several locations in the proposal appear convoluted and do not consider pedestrian/ active user desire lines. This is not conducive to encourage users to use the facilities.*
- *These north-south pedestrian and cycle connections across the proposed East West Link between local roads and boardwalks but do not fully mitigate nor improve upon the current amenity of these users given the level of severance resulting from construction of the new road.*
- *The proposed footpaths vary in width, are considered to be too narrow in some places, and being at the edge of the carriageway, will lack amenity.*
- *Around Karetu Portage Path pedestrian and cycle benefits will be provided by the elevated walkway as it will offer views of Anns Creek and the Mangere Inlet, but the elevation may deter some users.*
- *The pathway within Taumanu Reserve lacks the quality consistent with paths and the environment in the area.*

- *The route should enable general through traffic, including a cycleway, which is separate to the heavy road traffic to remove conflicts between heavy commercial traffic and pedestrian, cycle, or retail traffic in Onehunga Village.*

The following submissions provide a representative view in relation to pedestrian and cycle: Auckland Council (Submission No. 126336). This is not a complete list of submitters that had general and specific views on this theme. The Board will consider all submissions.

### 6.13 Third-party submission form subjects and themes

There were 419 submissions provided on a third-party submission form. The subjects and themes discussed in this form are largely reflected in the other submissions received by the EPA, and outlined above in this section of the report. The themes described in the third-party submission form include:

- *The potential adverse effects of the proposal have not been properly avoided or mitigated and are unlikely to be resolved without fundamental changes to the proposal.*
- *There will be a negative impact on the culture, social and community wellbeing, current and future open space and visual aspects of the Gloucester Park Interchange area.*
- *There will be adverse effects on the sense of place provided by the Taumanu Reserve, the Port of Onehunga, community groups, and the surrounding built and natural environment.*
- *The proposal has not minimised its footprint in the coastal environment and should protect and enhance this coastline.*
- *The proposal should be in keeping with the objectives and policies of Auckland Councils Regional Policy Statement with regards to development in the coastal environment.*
- *The proposal does not provide adequate public access to the coastal environment and does not enable use of the coastal environment by the community.*
- *The proposed shared path does not enable safe access for users to the waterfront.*
- *There will be an increase in the volume of traffic in the area which will result in increased exposure to noise and pollutants, and reduced safety for pedestrians and cyclists.*
- *With the Auckland Unitary Plan, there is an anticipated increase in residential dwellings and therefore a larger number of people in the community which will increase demand for public spaces.*
- *The proposal has the potential to improve connectivity between State Highway 20 and State Highway 1.*
- *The negative effects on social and community wellbeing will not support Auckland Councils vision to be the world's most liveable city.*

- *There will be adverse effects on historic volcanic features at the Gloucester Park interchange and along the Mangere Inlet foreshore.*
- *The proposal does not represent sustainable resource management.*

## 6.14 Other themes raised

Other themes raised commonly within submissions:

- *There were general concerns that the proposal does not meet the test of Part 2 of the RMA.*
- *The design does not satisfactorily consider, or account for integration of potential developments, e.g. construction of the 'New Old Mangere Bridge', installation of a Mass Rapid Transit (MRT) public transport route, and development of the Onehunga Wharf.*
- *The proposed road has complex interactions with existing consents and future proposed structures which need to be considered.*
- *There will be significant adverse effects on the Aotea Sea Scouts building and their ability to continue as they currently are within the community.*
- *The proposal should allow for the ongoing, safe and efficient operation, maintenance, and development of utility networks.*

## 7 Conditions Requested

Due to the number of conditions discussed within submissions, an amendment to this report will be prepared, and will be provided as an appendix, or a supplementary document at a later date.



## Appendix 1: Submissions by alphabetical order

## Appendix 2: Submissions by numerical order