

IN THE MATTER of the Resource Management
Act 1991 ("the Act")

AND

IN THE MATTER of the Notice of Requirement by
NZTA for the East West Link

AND A submission by Tram Lease

**STATEMENT OF EVIDENCE BY NICHOLAS JON ROBERTS ON BEHALF OF
TRAM LEASE**

DATED: 22 MAY 2017

1. EXECUTIVE SUMMARY

- 1.1 The East-West Link (**EWL**) project will have significant effects on the potential for the site at 19-21 Sylvia Park Road to be utilised for industrial purposes in accordance with its Light Industry zone. These effects include:
- a) A significant reduction (or elimination) of safe and efficient access to the site, particularly for heavy freight vehicles required for industrial activities;
 - b) Land take which restricts the growth potential of the existing long term tenant (Stratex) and restricts the flexibility of the site to be redeveloped for alternative industrial uses in accordance with its Light Industry zone;
 - c) Construction effects, in particular vibration, which present a significant risk to the viability of the Stratex business;
 - d) Reverse sensitivity effects from the proximity of the cycle and pedestrian pathway to the industrial air ducts, which could affect

renewal of the existing air discharge consent or future air discharge consent applications for alternative industrial tenants;

- e) Consequential economic and social effects from the potential relocation or closure of Stratex, and the inefficient use of industrially zoned land due to the above restrictions on the use and development of the site.

1.2 In my view, these potential localised effects and their implications on assessing the project under the statutory planning framework have been given inadequate consideration in NZTA's analysis of the project. Determination of localised effects should not be deferred through conditions to the Outline Plan of Works stage. In my view, potential effects including on the provision of safe and efficient access to the site should be adequately identified as part of the NoR and considered in determining the overall merits of the project.

1.3 Further, effects of the project on a property specific "micro" level should be given greater weight, as it is at the localised scale (rather than at the aggregated, high level) that project effects will be perceived. The significant adverse economic and social effects the EWL could cause should be given greater weight in the consideration of alternatives, and in determining the merits in approving the overall scheme.

2. INTRODUCTION

2.1 My full name is Nicholas Jon Roberts and I am a qualified resource management planner and director of Barker & Associates Limited, an independent planning consultancy based in Auckland.

2.2 I hold the Degree of a Bachelor of Planning from the University of Auckland and I am a full member of the New Zealand Planning Institute. I have 22 years' experience covering a wide range of land use and infrastructure planning matters on behalf of local authorities and private organisations in New Zealand. I am a member of the Auckland Council Urban Design Panel and the Auckland Council Unitary Plan Technical Advisory Panel. I am the recipient of the Nancy Northcroft Supreme Planning Award (2009). Relevant experience includes being Auckland Council's lead planner on the Residential and City Centre topics for the

Unitary Plan, and providing planning evidence for The Architecture Centre on NZTA's Basin Bridge proposal.

- 2.3 I consider that my background experience and knowledge of planning issues within the Auckland Region gives me a sound appreciation of the needs of the region and the ability to comment on the EWL proposal.
- 2.4 I have been engaged by Tram Lease who owns the property at 19-21 Sylvia Park Road to provide planning advice with respect to the impacts of the East West Link (**EWL**) on the subject site.
- 2.5 I have read the relevant sections of the EWL application documents, evidence of NZTA, Auckland Council, Auckland Transport and Stratex as referred to throughout this evidence, and I am familiar with the issues involved. I have visited the subject site.
- 2.6 I have read and am familiar with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2014. I agree to comply with that Code. Other than where I state that I am relying on the advice of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

3. SCOPE OF EVIDENCE

- 3.1 This evidence addresses matters raised in the submission of Tram Lease, particularly in relation to 19-21 Sylvia Park Road ("the subject site" – refer Figure 1 below). This site is bordered by Sylvia Park Road to the north, Great South Road to the west, and the North Island Main Trunk rail corridor to the south. It is zoned Light Industry under the Unitary Plan. The site is currently leased on a long term basis to Stratex. The submission and evidence of Stratex is also considered in this evidence given the interrelated matters in terms of effects of the project on this site.
- 3.2 In considering an NoR, Section 149P(5) refers the Board to Section 171 of the Act. This section therefore frames my planning analysis of the project's effects, with particular consideration of the effects on the subject site.

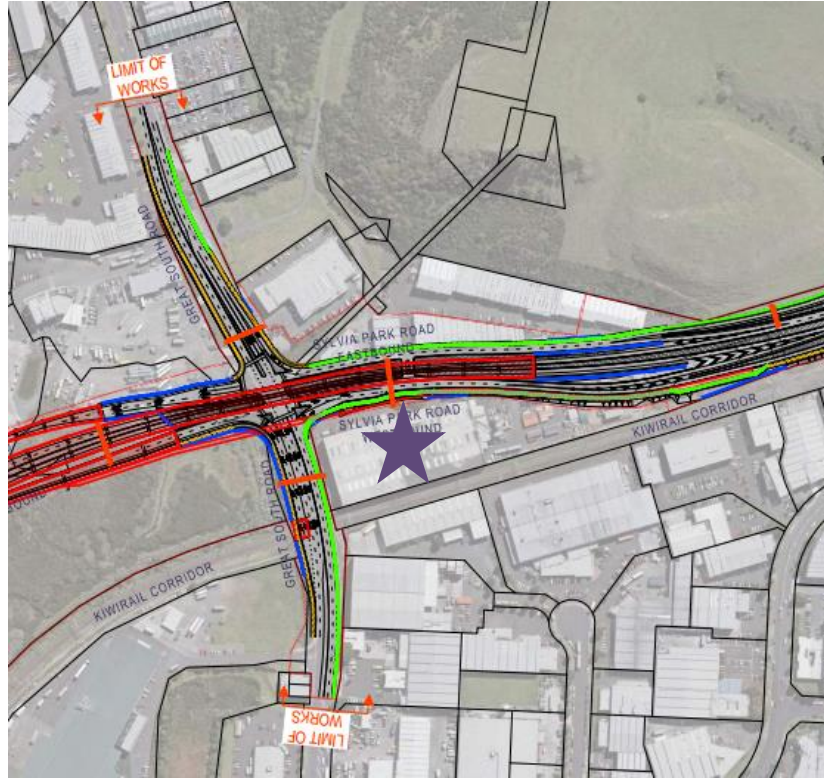


Figure 1: Location of subject site

4. PLANNING ANALYSIS

Effects assessment

- 4.1 When considering a requirement and any submissions received, the Board must consider the effects on the environment of allowing the requirement (s171(1)). Effects on the environment include any economic and social effects. Based on my review of the specialist evidence in relation to the subject site, the proposal is likely to have significant adverse effects on the environment at 19-21 Sylvia Park, and the surrounding area.

Transport and access

- 4.2 As addressed in Mr John Burgess's expert transport evidence for Tram Lease, there is currently significant uncertainty around the standard of access that can be achieved for the site (refer paragraph 23). A number of alternative options have been proposed by NZTA in the application, evidence, and subsequent discussions, in terms of:

- a) the number and location of access points for the subject site;

- b) whether the crossing points provide for both access and egress, or whether these movements are split across multiple crossings; and
- c) whether U-turns are proposed and can be safely accommodated on Sylvia Park Road.

- 4.3 The uncertainty in terms of what is being proposed by NZTA, and the design of these access and U-turn locations, results in consequential uncertainty about the extent of adverse effects on the safe and efficient access to the site for industrial purposes.
- 4.4 At the least, the project will remove right turn movements to and from the site, which will significantly affect the efficiency of access and egress. However, to some extent this could be mitigated by the provision of safe and efficient U-turn areas for heavy vehicles. Mr Burgess questions whether the intended U-turn areas can be designed to pass safety audits given the traffic environment that will exist in this area (refer paragraphs 14-24). Mr Michael Davis also raises this as a concern in his evidence for Auckland Transport, and suggest that U-turns should instead be accommodated at the Great South Road/Sylvia Park Road intersection (refer paragraphs 14-16). Auckland Transport suggests the design of Sylvia Park Road and the signalised intersection at Great South Road should be included as a specific consideration in Condition DC.11, requiring this to be resolved at the Outline Plan of Works stage. As noted by Mr Burgess (at paragraph 21), there is also uncertainty regarding acceptability of providing for U-turns at this intersection, which will again be contingent on later safety audits.
- 4.5 Further, safety and efficiency of the left in/left out movements is also questioned by Mr Burgess, who raises concern that these access points may not be able to be designed to pass safety audits (refer paragraphs 25-27). Should these movements not be able to be provided safely or efficiently, this would render the site effectively inaccessible for industrial purposes (or alternatively would result in significant safety and efficiency effects).
- 4.6 In my view, the uncertainty regarding the provision of U-turn movements and safe and efficient access and egress to and from the site is such that the effects of the designation cannot be adequately assessed at this

stage. Where there is a possibility that safe and efficient access cannot be provided to a significant industrial site, it is not appropriate to defer that to the Outline Plan of Works (**OPW**) stage. The access arrangements should be resolved as part of the current process, enabling those effects to be assessed when considering the overall merits of the proposal. Based on the evidence of John Burgess, with similar safety and efficiency concerns about U-turns on Sylvia Park Road raised by Auckland Transport, the adverse effects on the safety and efficiency of the transport network at this location may be significant.

Construction effects

- 4.7 As discussed in the technical evidence of Dominick Duschlbauer and Peter Runcie, and the corporate evidence of Brent Devlin for Stratex, construction vibration and dust will generate significant risk for operations of the existing activity. NZTA identifies that the vibration criteria will likely be exceeded by significant margins at the subject site.
- 4.8 The potential for vibration to affect the printing and laminating processes of Stratex could result in significant productivity losses and presents a genuine concern to the directors regarding the ongoing viability of their business (refer paragraphs 7.4 – 8.3 of Mr Devlin's evidence).
- 4.9 Additional concerns raised by Stratex in relation to the vibration include the potential movement and cracking of asbestos containing surfaces in the existing building, releasing the fibres (refer paragraph 7.11 of Mr Duschlbauer's evidence). This would present a concern for the wellbeing of staff, the public and Stratex's food standard accreditation (refer paragraph 7.4(b) of Mr Devlin's evidence).

Reverse sensitivity effects

- 4.10 Locating an elevated pedestrian and cycle path close to the existing air vents on the site poses a potential reverse sensitivity risk for industrial activities on the site (as addressed in Section 5 of the evidence of Dr Terence Brady for Stratex). Effects on users of that pathway would be considered as part of any renewal for the existing air discharge consent, and also for an air discharge associated with alternative activities for future possible tenants.

- 4.11 The nature of the current discharge involves odour, such that it may deter cyclists and pedestrians from utilising the paths, or would otherwise result in potential complaints and restrictions on the industrial operations at the subject site.
- 4.12 The potential effects from the air discharge on the amenity of the path was raised in Stratex's submission, and addressed in the evidence of Ms Needham for Auckland Council. Ms Needham considers that it is the responsibility of the consent holder to internalise their effects within the boundary of the site (refer paragraph 10.5). It is noted that the land take would relocate the boundary of the site, and the proximity of sensitive receivers would also be increased as a result of the EWL. These factors present an additional constraint to industrial air discharges on the site compared with the existing environment, effectively resulting in a potentially significant reverse sensitivity impact on the site.
- 4.13 In my view, effects from both the existing air discharge, and the potential for other air discharges for alternative industrial uses of the site, should be adequately considered, assessed and mitigated through the alignment and design of the pathway to minimise potential reverse sensitivity effects on the industrial site.

Economic and social effects

- 4.14 The extent of the proposed land take for the designation fundamentally reduces the potential for ongoing use and development on the site. The proposed designation extends into the subject site along the full width of the Sylvia Park Road frontage, reducing the oval area of the site by approximately 33% (from 21,858m² to 15,106m² – based on the most recent land requirement plan provided by NZTA). The land take also significantly reduces (by approximately 63%) the open areas of the site, reducing the potential for carparking and additional building development. The land take would result in a site shape that does not enable efficient use of the land area, with the eastern section reduced to 10m – 15m in width (refer paragraph 19 of Mr Tony Catton's evidence). I note also that the Light Industry zone requires a 2m landscaping strip along front boundaries. Redevelopment of the site, additions to the existing industrial operation or the construction of ancillary structure (such as a car parking

building) would trigger this requirement. Flexibility for alternative site layouts is minimal on this site given the shape is constrained by the rail line to the south, and Great South Road to the west. The land take would therefore significantly reduce the use and development potential of the subject site.

- 4.15 As discussed above, there is also uncertainty about the extent to which safe and efficient access can be provided to the site; the implications of construction works on the viability of the current tenant's operations; and potential reverse sensitivity issues from the cycle path on industrial activities requiring air discharges. The combination of these issues, together with the extent of the land take, threaten the viability of the existing tenant (Stratex) to remain operating at this location. Mr Devlin's evidence concludes that "*The Directors of Stratex believe the level of risk is unacceptable and consider full relocation of the business as the only acceptable mitigation, in lieu of a substantial reconfigure of the bypass design*" (refer paragraph 8.3). Relocation or closure of this business would have significant economic impact, not just for the business itself but also for those businesses that rely on its products. There would also be significant economic and social impacts for its staff.
- 4.16 Should Stratex not renew its long-term lease, that would also have significant economic effects for Tram Lease in terms of the value of the land and the potential to lease it to other industrial tenants. Mr Catton addresses the likely impact on Tram Lease's ability to find an alternative tenant. He confirms that the improvements on the subject site would need to be removed. The effects on the subject site's dimensions, profile and accessibility, particularly in the event that safe and efficient heavy vehicle access is significantly compromised, may render the site unleaseable for industrial activity.
- 4.17 In my view, the significance of these potential economic and social effects has not been adequately assessed in NZTA's application documents or evidence. Their position, as stated in the evidence of Mr Donald Harrington, is that any effects from the land take will be compensated through the Public Works Act acquisition process (refer paragraphs 7.16-7.18 and 7.20-7.21). In my opinion, it is not appropriate to simply defer consideration of significant environmental effects for

future assessment of compensation under the Public Works Act. These effects must be identified, quantified and assessed in determining the appropriateness or otherwise of the proposed requirement. Furthermore, the Public Works Act process does not provide for full financial compensation for the broader economic effects identified above. The potential economic implications for NZTA of the PWA reimbursement process have also not been identified in the overall analysis of the merits of the scheme.

- 4.18 Indeed, the economic evidence provided for NZTA does not give any consideration to adverse economic effects, only considering the economic benefits of the proposal (refer section 8 of Mr John Williamson's evidence). In my view, this is an unbalanced approach to assessing the effects of the EWL project. Mr Williamson's evidence states that submitters who raise concern about localised adverse economic effects do not give recognition to the broader benefits (refers 9.6-9.7), but then his evidence takes the opposite approach by not considering the potential adverse economic effects – beyond a general reference to compensation.

Conclusion

- 4.19 In my view, and based on the specialist evidence, there are potentially significant adverse effects of the EWL on the subject site that have been given inadequate consideration and weight in NZTA's analysis of the project. The uncertainty around the potential effects should not be deferred through conditions to the OPW stage, but should be resolved as part of this current process to enable a full assessment of the EWL proposal.
- 4.20 The potential economic and social effects from the relocation or closure of Stratex, and from the lack of safe and efficient access to the site, are significant and unlikely to be adequately mitigated through the PWA land take acquisition process. These effects should be considered in the overall determination of the merits of the EWL proposal.

Relevant planning provisions

- 4.21 When considering the relevance of the above identified effects in determining the NoR, the statutory planning context is also relevant.
- 4.22 The objectives and policies of the Unitary Plan Regional Policy Statement and Light Industry zone recognise the scarcity of industrial land in the Auckland region, and the need to avoid activities which may constrain industrial activities. The transportation policies seek to integrate land use and transport planning, and to provide an effective, efficient and safe transport system (e.g. RPS B3.3.1). Policies B3.3.2 1 and 2 specifically seek to enable the effective, efficient and safe development of all modes of an integrated transport system, and to ensure accessibility to sites. District Plan transport policy 4 specifically seeks that the *“provision of safe and efficient parking, loading and access is commensurate with the character, scale and intensity of the zone”*. In the case of the Light Industry zone, safe and efficient access for heavy freight vehicles should be provided.
- 4.23 Together, the policy direction of the transportation and industrial provisions of the Unitary Plan seeks to enhance accessibility and the efficient use of industrial sites. The evidence of Ms Andrea Rickard for NZTA addresses the relevant objectives and policies at a high level and concludes that the project will be consistent with the policy direction for transport and industrial growth (including at paragraphs 11.8 and 11.61). However, as discussed above, the project will have significant effects on the accessibility of the subject site and on its potential to be utilised efficiently for industrial purposes. These matters have not been clearly identified or assessed in NZTA’s statutory planning analysis. In my view, although these are “micro” level issues, they are significant and should be considered in the overall analysis of the project. Assessing the project only on high level “macro” issues does not acknowledge the complexity and fullness of its implications, and may result in an erroneous conclusion that the objectives and policies are met, when in practice there will be significant inconsistencies with the policy direction at the local level.

Consideration of alternatives

- 4.24 Section 171(1)(b) of the RMA requires the consideration of effects to have regard to whether there has been an adequate consideration of alternatives, in the event that *either* the requiring authority does not have an interest in the land sufficient for undertaking the work; or, it is likely that the work will have a significant adverse effect on the environment. In the case of this site, both apply, as NZTA is relying on taking land from the submitter that it does not own; and the project will affect the viability of the site to be utilised for industrial purposes, with consequential significant adverse effects.
- 4.25 The original proposal was for an “at-grade” intersection at Sylvia Park Road /Great South Road. The impacts of the designation on the size and shape of the residual property would have been less than currently proposed.
- 4.26 On 29 September 2016, NZTA held a workshop to consider alternative, grade-separated options for the Sylvia Park Road/Great South Road/EWA intersection against the MCA criteria. Details of the options and scoring are provided in Appendix P of Technical Report 1 to the application. In summary, the options considered were:
- a) Base Option (At-grade).
 - b) Option 1 – Grade Separated Separate Structure:
 - (i) Assume grade separation over Great South Road only;
 - (ii) Assumes that the EWL route goes over GSR.
 - c) Option 2 – Grade Separated Continuous Structure:
 - (i) Assumes grade separation over Great South Road via a continuous bridge structure that connects with SH1;
 - (ii) Assumes that the EWL route goes over GSR.
- 4.27 The grade-separated options significantly increase the area of land take required from 19-21 Sylvia Park Road to facilitate the EWL project.

4.28 The relevant criteria regarding the potential effects on the use, viability, and economic impacts of the options on the subject site are (as stated in NZTA's Technical Report 1):

a) Criteria 4E Viability of land areas:

- (i) The extent of land take (footprint) impact of land take on current and future use of industrial and business land
- (ii) Ease of relocation (of the activities occurring on the property – difficulty of re-consenting elsewhere)
- (iii) Availability of large industrial sites.

b) Criteria 4F Productivity of land:

- (i) Accessibility – and associated potential change in land values.

4.29 Despite the significant additional land take required for the subject site between the at-grade and grade-separation options, the negative score for criteria 4E “Viability of Land Areas” increased by only one point for both Options A and B, from -2 to -3. This was based on the stated assumption that the additional land take would not make the site unviable. The scoring did not take into account the criteria relating to the ease of relocation of the existing business. As discussed in the evidence for Stratex, the project presents a significant risk to the viability of the business on the subject site, and given the specialist nature and requirements of the business operation, relocation to an appropriate alternative site is difficult. Further, no consideration was given in the scoring to the impact of the land take on reducing the availability of large industrial sites in accordance with the stated criteria. The MCA scoring also states that the cost of business loss was not included, just the cost of the land. In my view, the potential significant impacts on the subject site have not been recognized in the scoring of the alternative options for the Great South Road intersection.

4.30 No scoring was undertaken for criteria 4F “Productivity of Land”. The stated reason is that grade-separation would provide better access to businesses along GSR/Sylvia Park. At this stage, it is not clear that safe

and efficient access can be provided to the subject site. No consideration is provided in the options analysis on the relative impacts on the efficient and productive use of land for industrial purposes, in accordance with the Light Industry zone. The differences in the productivity of land between the three alternatives therefore has not been recognized in the MCA scoring.

- 4.31 The evidence of Ms Amelia Linzey for NZTA on its alternatives assessment addresses the submission of Stratex and acknowledges that if the EWL resulted in that business ceasing operations, this would change the MCA scoring. However, in her view, given the relative transport efficiency between the at-grade or grade-separated options at Sylvia Park Road, allowing for closure of Stratex operations in the MCA analysis may not have resulted in the alternative, at-grade option being selected (refer paragraph 10.12). I note that the difference in scoring for the three alternatives in terms of improving travel times between business in the Onehunga-Penrose industrial area and State Highway 1 and 20 was only one point (i.e. 3 points for the base option, and 4 points for Options 1 and 2).
- 4.32 In my view, and having regard to MCA scoring, the efficiency losses from an at-grade option would be appropriate given the significant economic effects of the grade-separated option, including the PWA compensation requirements.
- 4.33 Alternatively, horizontal variations of the grade-separated options should be considered to achieve the efficiency benefits while reducing the impacts of the viability and productivity of industrial land.
- 4.34 NZTA's AEE stated that a number of options were identified along the Great South Road – Sylvia Park Road - SH1 alignment, however only one horizontal alignment option was identified as practicable for “safety and land use” reasons whilst seeking to avoid the transmission lines and encroachment into Mutukāroa-Hamllins Hill. The long-listed options provided in Appendix A of Technical Report 1 of the application documents show either no road upgrades in the vicinity of 19-21 Sylvia Park Road (Options 1 - 2 and 12 - 13), road upgrades in the currently proposed alignment (Options 3 - 11 and 14 - 15), or a road immediately

south of the subject site (Option 16). Alternative horizontal alignments for the road upgrades at Sylvia Park Road were not included as sub-options as part of the MCA evaluation process.

- 4.35 In my view, given the significant impacts of the selected grade-separation option, other horizontal alignments should be assessed to ensure “adequate consideration of alternatives” as required under Section 171(1)(b) of the RMA.
- 4.36 Ms Linzey’s evidence does not address whether alternative horizontal alignments could feasibly be achieved while reducing the significant safety and efficiency effects on access to the site, and economic effects from the constraints on the use and development of the site. I note that since NZTA’s evidence was submitted that they have sought to reduce the potential land take through design refinements, however, potential horizontal realignment has not been considered as an option.
- 4.37 Based on the summary provided in the AEE, I consider that that other horizontal alignment options were discounted too early in the process. For example, the alternatives assessment did not adequately consider the relative effects of a small landtake from the regional park from an alignment further north, compared with the effects on the viability of the current industrial activity and future use of the subject site, because this alternative was discounted at the outset.
- 4.38 Further, it appears that NZTA have sought to minimise the land take for both 19-21 Sylvia Park Road, and the opposite site at 20 Sylvia Park Road, to ensure that activities can continue to operate at both locations. In doing so, the proposed horizontal alignment generates a range of adverse effects on 19-21 Sylvia Park Road (as discussed above) while effectively halving the quantity of activity on 20 Sylvia Park Road and leaving the remaining units exposed to the visual, air discharge and noise effects of a two level road. The “compromise” approach to aligning the road upgrades between the two sites effectively results in both properties being significantly compromised.
- 4.39 Alternative horizontal alignments either to the north or south (as indicated on Figure 2 below), requiring the land take of the entirety of one or the other properties, should therefore be assessed. To avoid any effects on

the property 20 Sylvia Park Road, the intersection with Great South Road could be relocated further south. Undertaking full acquisition of one or other of the sites would have the advantage of reducing the amount of traffic generated by the activities along Sylvia Park Road and hence the frequency of U-turns or delays/detoured traffic, and would also simplify traffic arrangements around the Sylvia Park Road/Great South Road intersection.



Figure 2: Indicative alternative horizontal alignments

- 4.40 In summary, given the significance of the potential economic impacts on this site, in my view, further analysis should be given to alternative design approaches at this location. In particular, further consideration should be given to:
- a) Comparative merits of the at-grade or grade-separated options, with updated MCA scoring recognizing the viability and productivity effects of the grade-separated options; and
 - b) whether an alignment further north or south, or additional design alterations, could significantly reduce or avoid the land take requirement from the subject site (or 20 Sylvia Park Road).
- 4.41 Although the reduced land take would not fully mitigate the vibration and access issues, retaining additional land within the subject site would give greater flexibility for the landowner to be able to lease the site to an alternative tenant should Stratex withdraw from the site. Further, an alignment further north would minimize conflicts for U-turn movements and improve the overall safety and functioning of the access and road network at this location.

Objectives of the requiring authority for the project

- 4.42 Section 171(1)(c) requires consideration of whether the work and designation are 'reasonably necessary' for achieving the objectives of the requiring authority for which the designation is sought. The project objectives are set out in Section 3.3 of the AEE. The first objective is to improve travel times and travel time reliability between businesses in the area, SH1, and SH20. The project will reduce accessibility and increase travel time to and from the subject site by removing right turn movements to and from the site. Further, as discussed above, there are significant concerns about the safety and efficiency of U-turn movements, and even left in/left out movements at the sites proposed access points. These should be considered in the overall analysis of the project.
- 4.43 The second project objective seeks to improve safety and accessibility for cycling and walking. As it passes the subject site, the proposed elevated shared pathway will cross by the air vents for the activity, which are authorised by existing air discharge consents. As discussed above this may not be an appropriate "safe" environment for cyclists and pedestrians. Further, the evidence of John Burgess raises concerns about the safety of the cycle lane in the vicinity of the site, given the heavy vehicle movements proposed (refer paragraph 25).

Other matters

- 4.44 Section 171(1)(d) requires consideration to be given to other relevant matters. I agree with the evidence of Ms Rickard for NZTA that the Auckland Plan is a relevant matter for consideration. However, the same issues arise when considering the local implications of broader projects as discussed above in relation to the Unitary Plan.
- 4.45 I also consider that caution should be taken in utilising non-statutory strategic plans as justification for projects. The inclusion of the EWL in the Auckland Plan was not subject to full analysis of its relative costs and benefits. In particular, it was not identified at that time that the project would potentially result in the closure of a significant industrial business. The NoR should not be predetermined by the project's identification in the

Auckland Plan, but should be assessed in full on its relative merits and potential adverse effects.

5. CONCLUSIONS

- 5.1 Overall, I consider that the EWL as currently proposed will likely have significant adverse effects, including economic and social effects, on the environment. In my view, these effects have not been adequately identified and considered by NZTA in their analysis of the proposal.
- 5.2 In particular, further consideration should be given to resolving provision of safe and efficient access to the site for heavy freight vehicles as part of this current process, rather than deferring the matter to OPW stage.
- 5.3 Given the potential significant adverse effects of the EWL on the subject site, in my view further consideration should be given to horizontal and vertical alignment alternatives which would reduce the overall adverse effects of the project and/or reconsideration of providing for the Great South Road / Sylvia Park Road intersection at grade.
- 5.4 The significant transport, economic and social adverse effects of the EWL on the subject site should be considered in terms of the planning context when making a determination of the overall merits of the project.

DATED at Auckland this 22nd day of May, 2017

Nicholas Jon Roberts

Director