

**IN THE MATTER** of Section 149E of the Resource  
Management Act 1991

**AND**

**IN THE MATTER** of a submission by Kiwi Property Group  
Limited and Sylvia Park Business  
Centre Limited on the New Zealand  
Transport Agency's proposed East  
West Link project, which involves two  
notices of requirement and applications  
for 23 resource consents

**SUMMARY OF EVIDENCE OF MARK BENJAMIN LUKER  
ON BEHALF OF KIWI PROPERTY GROUP LIMITED  
AND SYLVIA PARK BUSINESS CENTRE LIMITED**

1. My full name is **Mark Benjamin Luker**. I am the project director for Sylvia Park Shopping Centre. I have prepared a statement of evidence dated 22 May 2017 in this matter on behalf of Kiwi Property Group Limited and Sylvia Park Business Centre Limited ("**Kiwi**").
2. My evidence explains the role and function of the Sylvia Park Metropolitan Centre and the Council's expectations for that centre to accommodate future population and commercial growth.
3. Kiwi is concerned that the proposed lack of integration between the East West Link ("**EWL**") and the South Eastern Arterial ("**SEART**") and the failure to provide a full range of movements at the SH1 interchanges with SEART and the EWL has the potential to create significant congestion and delays on the road network in the vicinity of Sylvia Park for both through traffic and vehicles travelling to or from Sylvia Park. Put simply, Kiwi considers it likely that drivers travelling between East and West Auckland along SEART will elect to travel on streets in the immediate vicinity of

Sylvia Park in order to access the EWL ( eg: to “rat run” along streets such as Carbine Road and Clemow Drive).

4. NZTA’s witnesses (e.g.: Mr Murray) have argued that no distinction should be drawn between congestion generated by traffic accessing Sylvia Park and traffic passing through the area. Kiwi does not agree.
  - a. Traffic accessing Sylvia Park by definition needs to travel along roads in its immediate vicinity whereas through traffic would not need to use the roads in the immediate vicinity of Sylvia Park if there was a direct alternative.
  - b. In addition, the intensification of activity at Sylvia Park will contribute to the pool of potential patrons of public transport. That is likely to increase public transport use which in turn will increase the viability of additional public transport services. In contrast, through traffic cannot make easily use of public transport services or contribute to its efficiency.
  - c. Thus diversion of through traffic onto the roads immediately around Sylvia Park would add to congestion in the vicinity of a centre that the Council has identified as being a critical part of its strategy for accommodating future growth but without contributing to the growth of that centre.
5. Kiwi asks that a condition be imposed on the EWL project requiring monitoring of traffic conditions in the immediate vicinity of Sylvia Park before and after development of the EWL along with consultation with Kiwi and Auckland Transport with regard to mitigation measures, should any adverse effects become apparent.
6. NZTA’s witnesses have been asked by the Board of Inquiry to provide a draft condition regarding monitoring. That condition was received yesterday evening and Kiwi’s traffic engineer, John Parlane will comment on it in his supplementary statement of evidence. Kiwi supports the wording suggested by Mr Parlane.
7. The condition drafted by NZTA relates to monitoring in the vicinity of the EWL as a whole. Kiwi does not oppose a broader monitoring condition but does ask that the provisions in respect of monitoring in the vicinity of Sylvia Park:
  - a. Be specific enough to give comfort that any adverse effects will be identified; and
  - b. Require NZTA to consult with Kiwi in the event that such effects are identified.

Kiwi does not seek to specify or impose a requirement to implement particular forms of mitigation.

8. NZTA's memorandum to the Board of Inquiry advises that it does not support the imposition of a monitoring condition, even in the form drafted by it. Kiwi is concerned that, in the absence of such a monitoring condition, any adverse effects on the road network in the vicinity of Sylvia Park that are generated by the EWL will not be identified, monitored or responded to. My understanding is that NZTA contends that it would carry out such monitoring anyway and that it already works closely with Auckland Transport to address traffic effects. In that case, I do not understand how imposition of Kiwi's proposed condition would be problematic for NZTA.
9. Kiwi therefore considers it reasonable and appropriate for monitoring to be required through the condition set out in Mr Parlane's supplementary statement of evidence.

**Mark Luker – 22 August 2017**