

**Timotheus Frank**

Representation to the  
Board of Inquiry  
East-West Link Proposal

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**1. Archaeological Report (Item 1.2 of my submission)**

The archaeological report and Dr Felgate in his evidence concluded that the proposed measures would be adequate to deal with the archaeological material, which would probably be found.

But in this evidence an important step has been omitted. The principle of the Heritage New Zealand Pouhere Taonga Act 2014 and international archaeological literature is that, where possible, an archaeological site should not be modified or destroyed, unless such modification and destruction is considered valuable to provide evidence of the lifeways or origins of past or present societies. There has been no consideration whether in this case the destruction is likely to provide important evidence of the lifeways or origins of past or present societies in a manner that makes it more valuable than the preservation of the archaeological site. Such a balancing act is continually undertaken by archaeologists. Often that means that only part of a site is excavated if it is thought to provide valuable evidence, while another part is preserved.

It is unlikely that in this case the study of the likely archaeological sites would outweigh their preservation. But the archaeological report does not address that question, as it should have. If this is the case, it then becomes a question of weighing the preservation of archaeological sites against other factors, such as the transport needs of the current society. That is your role.

The report is flawed by assuming that the road will be built and proposing mitigating factors rather than explaining the tension. From an archaeological viewpoint it is likely that protection of sites should be the first consideration, and only if other factors outweigh this, mitigating steps need to be considered.

I focus on this example, but other reports make a similar mistake of assuming that the road will be built, rather than providing evidence for a decision.

**2. Assessing the proposal against alternatives (Item 2 of my submission)**

I submit that the NZTA has not adequately assessed alternatives to the proposal. I know that other witnesses have said otherwise. The NZTA did consider several alternatives. But all these were based on a major road from the Penrose area to the Onehunga area. There are many other alternatives to address the traffic situation, which do not involve the building of a road. I have listed some suggestions in my submission. Examples: multiple rail terminals in Auckland; the completion of the Avondale-Southdown rail link; better public transport through the area and to main destinations, such as the airport. There are more options. None of them have been closely assessed, but they should have

been. The Resource Management Act and the Land Transport Management Act clearly envisage such “soft” alternatives.

A further issue is that the alternatives the NZTA looked at mainly seem to address one objective (improve car and truck travel times and travel reliability), rather than starting with the other objectives. Indeed, the other objectives are just an add-on. No alternative has been assessed, which would just address the other two objectives (safety and cycling access; improve time reliability for buses).

**3. Importance of walkway (Item 2.2 in my submission)**

In the hearing, several parties have questioned the land acquisition, expense and necessity of the coastal walkway. I submit that without such a coastal walkway the East-West Link would contravene the matters of national importance set out in section 6 of the Resource Management Act 1991, in particular subsection (d) the maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers. For without the proposed coastal walkway, the East-West Link would take away public access to and along the coastal marine area. In no way can this matter of national importance be recognised and provided for through the East-West Link, if such a walkway does not exist.

**4. Space for additional tracks on the North Island Main Trunk Railway Line (Item 3.2 in my submission)**

It is likely that the North Island Main Trunk Railway Line will not only need additional tracks from Papakura to Westfield, but also to Auckland. This is an essential piece of transport infrastructure for the growth of Auckland.

The East-West Link could hinder the formation of such additional tracks between Westfield and Sylvia Park. There is probably enough space within the current railway corridor for one additional track, but probably not for two. To my knowledge, this has not been addressed in the plans. Along the proposed southern limit of the East-West Link corridor along Sylvia Park Road, proposed infrastructure is very close to the railway corridor, preventing future widening of the railway corridor.

Currently, the Great South Road railway overbridge does not allow additional tracks to pass under it. The Mt Wellington Highway overbridge also seems a restriction for additional tracks. It seems that these two overbridges will be modified. If so, they should be future-proofed for additional railway tracks passing underneath.

Similarly, the proposed connection to State Highway 1 crosses the railway line. This connection needs to leave sufficient space to allow for further tracks along the railway corridor.

In the interest of the future development of Auckland, relevant conditions need to be included in any resource consents, if the board decides to grant those consents.

**5. NZTA and Auckland Transport as experts**

During the hearing, it has been repeatedly argued that the NZTA and Auckland Transport are the experts on transport. Because they support the East-West Link, so it is said, it must stack up from a transport perspective. I submit that this is a wrong assumption. As far as transport is concerned, we are currently in the middle of a paradigm shift. A paradigm shift is a fundamental change in the concepts, practices and—in this case—

models of a scientific or professional discipline. The NZTA and—to a lesser degree—AT are still largely governed by the old paradigm of road building. These are planners who have been trained to achieve a certain Level of Service by adding more lanes or more direct roads. Their models hardly recognise induced demand in urban areas. Through nice add-ons like a shared path and improvements for buses, these experts do give some notion of change, but they still operate under the old paradigm.

Evidence of such a paradigm shift is, for example, shown in a commentary by Auckland Council economists Harshal Chitale and David Norman. They write:

International studies have shown that expanding the roading network, either by building new roads and/or widening existing roads, typically does not keep up with the increase in the number of private vehicles because of induced demand.

In other words, an approach focused on simply building more roads is unlikely to effectively address congestion.

As noted by the Parliamentary Commissioner for the Environment and the Royal Society of New Zealand, transport is a significant source of carbon emissions, which could easily be reduced by adopting different policies. Building more roads for more cars does not represent such a change in policy.

Often those leading paradigm shifts are not really inside the group of professionals, who are too much invested in the status quo. Rather, it is interested outsiders—and even though I worked in transport administrations, I now consider myself one of these outsiders—who push for change. This is picked up by a section of society and in this way exerts influence on experts, who over time then follow the shift. A simple example from my own experience may be suitable. Twenty years ago when I was in Dunedin, I suggested that the public transport network should be reformed so that it would have fewer bus routes, but more buses on them, which would leave in regular intervals and allow transfer between them. I was told that the model does not allow this. In 2017, a bus network very similar to the one I suggested was introduced. There was a fundamental shift in how public transport should be operated, but transport experts resisted it for a long time.

