

**BEFORE A BOARD OF INQUIRY
EAST WEST LINK PROJECT**

UNDER the Resource Management Act 1991 (the RMA)

In the matter of

a Board of Inquiry appointed under s149J of the Resource Management Act 1991 to consider notices of requirement and applications for resource consent made by the New Zealand Transport Agency in relation to the East West Link road proposal in Auckland

Closing Statements of Peter Gibson on behalf of Onehunga Business Association

Dated: 13 September 2017

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INTRODUCTION:

1. My name is Peter Henry Gibson. I am the President/Chairperson of the Onehunga Business Association (OBA). I have held this position for 13 years.
2. I am a landlord and business owner in Onehunga.
3. I am a committee member and Vice Chairperson of TOES and I have been involved with this organisation since its inception as one of the original members.

BACKGROUND:

4. The Onehunga Business Association (OBA) would like to reiterate some of our concerns and highlight some of the conditions discussed during this process in our final closing
5. To repeat the OBA has recognised the huge impact that congested traffic is having in the area over recent years and has voiced its concerns strongly.
6. We confirm that while the OBA is fundamentally supportive of improvements the east-west link between SH1 and SH20 could make to this community, however, the OBA still has some major concerns regarding the effects of the proposed EWL on the Onehunga community, especially the business community.

SUMMARY OF EVIDENCE

7. The OBA made a submission to the East West Link Project (**EWL**) lodged by NZTA with the Environmental Protection Authority (**EPA**).
8. The OBA highlighted concerns about a number of aspects of the application, including:
 - a. The Gloucester Park/ Neilson St interchange

- b. The Wharf connection
 - c. The Galway Link
 - d. The lack of information in the Application
 - e. The Mangere Bridge connections
 - f. The consideration of alternative options
 - g. The Walkway between Manukau Harbour Cruising Club and the Wharf
 - h. The effects of construction on businesses in Onehunga
 - i. The impact on local roads
 - j. The traffic assessment
 - k. The Economic assessment
 - l. The outcomes from the EWL
9. During this process, some of the OBA concerns have been addressed with conditions and these have been noted in this document.
10. There is still a fundamental concern that the EWL Project must provide a balance between transport requirements, sustainable economic outcomes, potential growth and community expectations of recreation and environmental recovery.
11. It is the OBA's position that alternatives have not been properly identified and considered. This was supported by G Hoheisel evidence during cross examination by Dr Priestly. The lack of searching for a better option as stated by Mr Hoheisel¹ "in Germany there would be definitely architectural competitions for such projects, even open competitions to get the best results possible for such an area".
12. The objectives of NZTA are not narrowly limited to building major roads or motorways, but are defined broadly to promote an affordable, integrated, safe, responsive and sustainable land transport system.

¹ Page 4740

THE RESOURCE MANAGEMENT ACT 1991

13. This project is overseen by the RMA and the OBA has concerns that the Purpose and Principles (Part 2, 5.2 a -c) are not being followed as in:

- (2) In this Act, **sustainable management** means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while—sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
- (b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
- (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

6 Matters of national importance

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the following matters of national importance:

the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development:

(b) the protection of outstanding natural features and landscapes from inappropriate

subdivision, use, and development:

(c) the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna:

(d) the maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers:

(e) the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga:

(f) the protection of historic heritage from inappropriate subdivision, use, and development:

(g) the protection of protected customary rights:

(h) the management of significant risks from natural hazards.

7 Other matters

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to—kaitiakitanga:

(aa) the ethic of stewardship:

(b) the efficient use and development of natural and physical resources:

(ba) the efficiency of the end use of energy:

(c) the maintenance and enhancement of amenity values:

(d) intrinsic values of ecosystems:

- (e) [Repealed]*
- (f) maintenance and enhancement of the quality of the environment:*
- (g) any finite characteristics of natural and physical resources:*
- (h) the protection of the habitat of trout and salmon:*
 - the effects of climate change:*
 - the benefits to be derived from the use and development of renewable energy.*

WHARF CONNECTION AND ONEHUNGA MALL

14. Cross examination of Mr Marler highlighted a concern held by Panuku and the OBA of the lack of planning for the future use of the Onehunga area including the Port and Public transport options².
15. Before this project goes ahead and as per the RMA Part 2, how can a project with so much impact not have integrated planning to make certain you have the sustainable development of an area. Mr Marler spoke of how they brought Wynyard Quarter together through integrated planning. This provides for holistic planning preventing the potential of missing an opportunity

² MS KINZETT: Okay. Going with that rail connection, you have already said that it 25 would be your aspiration, talking to Mr Bickers' questions, that you would like to see the rail connection come down from Onehunga, attach to the port and then go across, potentially on the new Old Mangere Bridge.

30 MR MARLER: Correct.

MS KINZETT: What value would that actually bring, your thoughts?

MR MARLER: Significant connectivity.

35

MS KINZETT: So with the port itself potentially being regenerated and having more business/residential, that would get more movement instead of people in their vehicles?

40 MR MARLER: Correct.

MS KINZETT: One of the things you did speak about was the Galway interchange and with the connection, on 9.9 of your evidence, you spoke about between 6,000 and 8,000 vehicle movements, two-way movements, daily and 45 your concern about those movements.

16. Mr Marler³ confirmed the OBA concerns that the Wharf area could potentially be left in any state and that NZTA may decide to take more than the current 6500 sqm. This could potentially harm the economic viability of the Wharf / Port area as it will reduce the potential development space.
17. The OBA suggests a condition
 - a. On purchasing the Wharf and Port area of Onehunga NZTA agrees to only use no more than 6500 sqm and will leave the area clean without any construction material
18. The other area of discussion was the trench for the EWL. Mr Marler⁴ spoke of the need to lower the trench to allow for better access to the Wharf area due to the potential steepness of the entry and this will in turn open up the rail link

³ Page 3229

MR MARLER: A condition or specific conditions in the memorandum of understanding or agreement.

MS KINZETT: Okay, that would be great. What about also how much space they take
Page 3320

in the port? Because I know at the moment they're talking about 80,000 squares, 8,000 squares.

MR MARLER: 6,500 square metres.

5

MS KINZETT: 6,000 squares. It sounded more dramatic at 80,000, but would it be good to have a condition as part of it saying that they can only take "up to" to make sure there is enough space for the port left to be viable economically?

⁴ MS KINZETT: So what does that actually mean? So there's going to be quite a steep incline with the connection?

40

MR MARLER: Challenging.

MS KINZETT: Challenging?

45 MR MARLER: Correct.

MS KINZETT: What would you suggest would be a good way to remedy that challenge?

Page 3318

MR MARLER: By reducing or lowering the level of the trench.

MS KINZETT: So it's important that the East 5 West Link really needs to go down further?

MR MARLER: Lower, correct.

10 MS KINZETT: By reducing it, taking it down further, would that not then open up the potential of the rail coming through and connecting with the wharf area as well?

MR MARLER: Possibly, yes.

15

MS KINZETT: So potentially you're actually opening up more possibilities --

MR MARLER: Connectivity.

20 MS KINZETT: -- and better movement?

MR MARLER: Correct.

OLD MANGERE BRIDGE

19. This concern has not been addressed through this process and it is problematic to have such an important local connection not being integrated into future development options.

ALTERNATIVE OPTIONS

20. Alternatives have been discussed in various stages. The OBA did offer a design which has been canvassed in the AEE and the EIC and now in Amelia Linzey's additional evidence dated 8 September 2017
Dr Priestly questioned Ms Linzey regarding the decision making level of the MCA⁵, highlighting it is 'not a tool to make decisions'
21. See Appendix for the design timeline and changes. Here you will notice NZTA kept to their original design while the OBA and then Community plan morphed with feedback. NZTA were part of these as they have said we were in consultation frequently and they were given each change as it was discussed and agreed by community stakeholders.
22. At its core, the OBA and its members believed (and still believe) that there is a better design option for Onehunga as discussed with Mr Hoheisel

⁵ Page 1078

DR PRIESTLEY: Would you agree with me that so far as the MCA is concerned, although extensive in its range, it's not necessarily going to come up with one magical correct answer and that different specialists using the MCA could well quite legitimately come to different results?

30 MS LINZEY: Simply, yes. In a more detailed way, by going through these criteria - and we did that both at the corridors assessment and then at the alignment assessment - we did specifically look to make those criteria both measurable and able to differentiate between options. So we had a review process that went through to try to maximise the ability for it 35 to be repeatable in a consistent way.

Page 1079 But absolutely I would agree not every expert is going to score it in exactly the same way. That is why, in my view, it is 45 important as an information base to support decision-making, it is not the tool to make the decision.

23. Following cross examination of Miss Kinzett by NZTA it became apparent that while the NZTA version did have some form of analysis the version that the community and OBA have been using is different. See Appendix of timeline.

24. Perplexing statements were made by NZTA during discussions with OBA and the Community groups

- the agency felt that the OBA design was too efficient by removing traffic from local roads and this was not a requirement of the Project. Yet NZTA had, in their consultation material, been prominently listing as one of the benefits of the EWL Proposal, the removal of traffic from local streets.
- the efficiency of the connections to SH20 were such that they would place pressure on other parts of their network and therefore this was regarded as a negative factor in the OBA/Community Plan.

25. The OBA believes that after going through the AEE and Primary Evidence that NZTA have, through weighting their priorities ahead of the OBA/Community Plan, seriously over-played the environmental impacts of the OBA/Community design and downplayed the impact of their option.

26. Our witness Gregor Hoheisel highlighted some of the future planning options that should be applied in considering a project of this significance.

27. In response to Mr Parsons request regarding the timeline for the OBA/community plan and significant events we refer you to the Appendix 1 that sets out the progressive development of the OBA/Community concept.

CONDITIONS FOR DELIVERY

28. Condition DC.12A - This condition still does not include the connection to the port of Onehunga. The OBA still holds that light rail to the port must not be compromised by this project as it is future proofing. Suggest adding in under point 4: *Allowing for the option to include a stop at the Onehunga Wharf/Port*

1. <u>DC.12A</u>	2. <u>NoR</u> 1	<p>3. <u>As part of the Outline Plan(s) prepared under section 176A of the RMA, the Requiring Authority shall demonstrate how the following proposed transport projects are not precluded, and where practicable, are accommodated by the Project:</u></p> <p>4. <u>A future Mass Rapid Transit connection to the Auckland International Airport, and in particular ensuring as a minimum the preferred alignment identified in the South-West Multi-Modal Airport Rapid Transit Draft Indicative Business Case is provided for by the Project; Allowing for the option to include a stop at the Onehunga Wharf/Port</u></p> <p>5. <u>A future multi-modal link road to the Sylvia Park Town Centre as part of the AMETI programme, in particular ensuring that the location of piers does not preclude the alignment and any of the proposed modes; and</u></p> <p>6. <u>iii) Future potential improvements to rail at the Westfield Junction including provision for grade-separation and a new north-facing connection between the North Island Main Trunk and the North Auckland Line, and additional lines for freight.</u></p>
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29. Conditions to support business activity over the 5 year construction is imperative to reduce the economic impact:

- a. Ensuring that business efficiency is not undermined by the EWL through poor design, project delivery and poor future efficiency –
- b. Ensuring that the construction period of five years will not lead to businesses leaving the area due to not problems moving staff, goods and customers in and out of the area.

- c. Ensuing that connections to the harbour (especially the wharf, but also other locations) are not severed by the EWL (and undermine future opportunities for business and residential communities)
- d. increased conditions to make certain the local road network does not become victim to large truck rat running

CONSTRUCTION

30. Additions to the conditions of the Construction traffic as noted in red
CT.6, CT.8, CT 9, RC.11 (s)

<u>Construction traffic - general requirements</u>		
CT.5	NoR 1 NoR 2	The CTMP and TMP(s) shall be consistent with the version of the NZ Transport Agency <i>Code of Practice for Temporary Traffic Management</i> or the Auckland Transport <i>Auckland Transport Code of Practice</i> (which applies at the time the CTMP or the relevant TMP is prepared).
CT.6	NoR 1 NoR 2	<p>The <u>site/activity specific</u> TMP(s) shall be prepared following consultation with the following key stakeholders (as relevant):</p> <p>Auckland Transport (where local roads and paths will be affected);</p> <p>National Road Carriers Incorporated and NZ Heavy Haulage Association; Onehunga Business Association</p> <p>Public transport providers (where public transport services will be affected);</p> <p>Emergency services (police, fire and ambulance); and</p> <p>Schools and childcare centres with frontage or access to roads within which works in relation to the relevant part of the Project will take place; and</p> <p>Directly affected property and business owners and operators.</p>
CT.7	NoR 1 NoR 2	The Requiring Authority shall implement each TMP for the duration of the Construction Works to which the particular TMP applies. The TMP will include roads in the local network that can be used by the construction and detoured vehicles and roads that will be prohibited. This will include a ban on large trucks through the Town Centre

CT.8	NoR 1 NoR 2	Prior to the use of any site access points from local roads, the Requiring Authority shall prepare a photographic record of the pre-construction state of those access points. This shall be provided to the Manager prior to Commencement of Construction at that location. A copy of the record shall also be provided to Auckland Transport.
CT.9	NoR 1 NoR 2	Any damage in the to a local road and or arterial road corridor beyond the boundary of the designated land which is verified by a Suitably Qualified Person as being directly attributable to heavy vehicles entering or exiting construction sites This includes damage during transportation through the local road network to the construction site, shall be repaired within two weeks or within an alternative timeframe to be agreed with Auckland Transport. All repairs shall be undertaken by the Requiring Authority in accordance with the <u>Auckland Transport Code of Practice.</u>

RC.11	<p>The CEMP shall be prepared in accordance with the NZ <i>Transport Agency's Guideline for preparing Environmental and Social Management Plans</i> (dated April 2014) and include:</p> <p>Confirmation of the proposed staging and sequence of construction;</p> <p>An outline construction programme;</p> <p>Contact details of the site supervisor or project manager and the Consent Holder's Project Liaison Person (phone, postal address, email address);</p> <p>Methods and systems to inform and train all persons working on the site of potential environmental issues and how to avoid remedy or mitigate any potential adverse effects;</p> <p>The proposed hours of work;</p> <p>Measures to be adopted to maintain the land affected by the works in a tidy condition in terms of disposal / storage of rubbish, storage and unloading of construction materials and similar construction activities;</p> <p>Location of construction site infrastructure including site offices, site amenities, contractors' yard access, equipment unloading and storage areas, contractor car parking and security;</p> <p>Procedures for controlling sediment run-off, dust and the removal of soil, debris, demolition and construction materials (if any) from public roads or places adjacent to the work site;</p> <p>Procedures for ensuring that residents, network utility operators, road users and businesses in the immediate vicinity of construction areas are given prior notice of the Commencement of Construction and are informed about the expected duration and effects of the work;</p> <p>Means of providing for the health and safety of the general public;</p> <p><u>Proposed temporary or permanent fencing along the boundary of the designation with adjacent sites in order to delineate site boundaries, maintain site security, prevent unauthorised access, and to avoid intrusion of Construction Works beyond the designated land;</u></p> <p>(k) <u>Measures</u> to manage the potential impacts of construction on Council trees and vegetation;</p>
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	<p>(im) Methods and measures to avoid, remedy and mitigate adverse effects on landscape amenity during the construction phase of the Project;</p> <p>(rn) Procedures for the refuelling of plant and equipment;</p> <p>(AO) Measures to address the storage of fuels, lubricants, hazardous and/or dangerous materials, along with contingency procedures to address emergency spill response(s) and clean up;</p> <p>(op) Procedures for the maintenance of machinery to avoid discharges of fuels of lubricants to watercourses and/or the Coastal Marine Area (CMA);</p> <p>(pg) Procedures for responding to complaints about construction activities; and</p> <p>(ei) Procedures for incident management.</p> <p>(s) Traffic mapping procedures to avoid local roads being used by construction vehicles</p>
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COMMUNICATION

31. Communication will be a critical part of the success of this project should it go ahead and it will be important for the OBA to have as much information as possible as early in the process as possible. The earlier businesses are able to plan for disruption the better for all: CS.2

Communications Plan		
CS.2	NoR 1	Prior to the Commencement of Construction and/or Enabling Works, the Requiring Authority shall prepare and implement a Communications Plan .
	NoR 2	<p>The purpose of the plan is to set out procedures detailing how the public, stakeholders, businesses and residents will be communicated with throughout the pre-construction and construction phases of the Project.</p> <p>As a minimum, the Communications Plan shall include:</p> <p>Details of the Project Liaison Person (Condition CS.1). The contact details shall be on the Project website and prominently displayed at the entrance to the site(s) so that they are clearly visible to the public at all times;</p> <p>A list of stakeholders, organisations, businesses and residents who will be communicated with;</p> <p>Methods to consult on and to communicate the proposed hours of construction activities outside of normal working hours and on weekends and public holidays, to surrounding businesses and residential communities, and methods to deal with concerns raised about such hours;</p> <p>Methods to record concerns raised about hours of construction activities and methods to avoid particular times of day which have been identified as being particularly sensitive for neighbours;</p> <p>Any stakeholder specific communication plans required;</p> <p>Details of communications activities proposed including:</p>

		<p>Publication of newsletters, or similar, and proposed delivery areas;</p> <p><u>Information days, open days or other mechanisms to facilitate community engagement;</u></p> <p>Newspaper advertising;</p> <p>Notification and consultation with business owners and operators and individual property owners and occupiers with premises/dwellings within 100 metres of active construction; Taking into consideration the impact these works will have on the area (due to the road network) communication will also include a wider area of notification being a minimum of 300 metres and all information sent to the Onehunga Business Association for further dissemination throughout the Onehunga area</p> <p><u>Identify processes, mechanisms and / or specific methods to facilitate two-way communication with those with impairments or for those for whom English is a second language.</u></p> <p>Details of the Project website;</p> <p>Linkages and cross-references to communication methods set out in other conditions and management plans where relevant; and</p> <p>Details of when the Plan will be reviewed and amended.</p> <p>The Communications Plan shall be provided to the Manager and Onehunga Business Association for information no later than 20 working days prior to Commencement of Construction and following any material amendments of the Plan.</p>
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COMMUNITY LIAISON GROUP

<i>Community Liaison Groups</i>		
CS.3	<p>NoR 1</p> <p>NoR 2</p>	<p>The Requiring Authority shall establish and co-ordinate a Community Liaison Group (CLG) in each of the following areas at least 3 months prior to the Commencement of Construction in each of those areas:</p> <p>Onehunga and Penrose including the Onehunga Harbour Road residential area <u>and Māngere Bridge</u>; and</p> <p>State Highway 1 including the Ōtāhuhu and Panama Road residential areas.</p> <p>The purpose of the CLG is to provide a means for:</p> <p>Sharing information on design, construction works and programme;</p> <p>Reporting and responding to concerns and issues raised in relation to <u>C</u>onstruction Works; and</p> <p>Monitoring the effects on the community arising from Construction Works in these areas.</p> <p>The Requiring Authority shall assist the CLG to hold regular meetings (at least once every three months) throughout the</p>

		<p>construction period in these areas. The CLG shall continue until six months after Completion of Construction so that on-going monitoring information can continue to be shared, discussed and responded to. The frequency and duration of the meetings can be reduced where the majority of the members of the group agree.</p> <p>In addition to the Project Liaison Person and representative(s) of the Requiring Authority and its principal construction contractor, membership of the CLG shall be open to all interested parties within the Project area including, but not limited to representatives of the following groups:</p> <p>Council, Auckland Transport and other Council Controlled Organisation;</p> <p>Department of Conservation;</p> <p>Mana Whenua;</p> <p>Business groups; Onehunga Business Association</p> <p>Community/environmental groups;</p> <p><u>Transport user groups;</u></p> <p>vi)<u>vii)</u> Local Boards;</p> <p>vii)<u>viii)</u> Local residents and business owners/operators; and</p> <p>viii)<u>ix)</u> Representatives from those organisations identified in the Communications Plan (as required by Condition CS.2); and</p> <p><u>x) Ministry of Education.</u></p> <p>The Requiring Authority shall prepare an agenda for each meeting and prepare minutes recording actions. A copy of the minutes shall be provided to the meeting invitees within a reasonable time following the meeting.</p> <p>The Requiring Authority shall be responsible for all reasonable costs associated with resourcing of the CLGs.</p>
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COASTAL WORKS CEMP – DREDGING

32. Dredging of the Port area has been a discussion point since this project was first flagged and is an important part of the mitigation that needs to be included into the conditions D.1

Coastal Works CEMP – Dredging	
D.1	<p><u>In addition to the matters in Condition C.4, the Coastal Works CEMP shall also include the following matters relating to dredging, filling of dredged channels and placement of dredged material in the CMA:</u></p> <p><u>(a) The results of contaminant and ecological surveys undertaken in accordance with Condition D.1A to confirm the location and extent of subtidal dredging;</u></p> <p><u>(ab) Location of the activities; including the port area under and between the wharves</u></p>

	<p>(bc) Details of equipment and methods to be used;</p> <p>(ed) Proposed staging of the reclamation to minimise exposed areas;</p> <p>(de) Details of proposed quantities of dredged material removed and placed in the CMA, and</p> <p>(ef) Timing of activities.</p>
D.1A	<p>(a) <u>Prior to commencing subtidal dredging activities, the Consent Holder shall undertake further ecological and contaminant surveys within the general extent of the proposed subtidal dredging area.</u></p> <p>(b) <u>The surveys shall confirm the location and extent of:</u></p> <p style="padding-left: 20px;">i) <u>Asian date mussels beds being areas of lower ecological value; and</u></p> <p style="padding-left: 20px;">ii) <u>Areas of contaminated sediment.</u></p> <p>(c) <u>The surveys will inform the location and extent of the subtidal dredging activities, with the objective being to refine the areas of perposed proposed dredging to target, where practicable, areas of lower ecological value and lower levels of contaminated material.</u></p> <p>(d) <u>The results of the surveys shall be provided to the Manager.</u></p>

CONTAMINATION

33. Further to cross examination of Mr Willis it was agreed that the area between Gloucester Park West and Sea Scouts would be included in any further investigations and added to any containment plan needed L.1 in red

L.1	<p>(a) <u>The Consent Holder shall undertake further assessment and if necessary, soil and groundwater investigations in the area of uncontrolled fill between the Pikes Point West and Pikes Point East Closed Landfills (Lot 1 DP135209), for the following purposes:</u></p> <p style="padding-left: 20px;">(i) <u>To characterise the nature of the fill materials; and</u></p> <p style="padding-left: 20px;">(ii) <u>To inform the design of leachate infrastructure.</u></p> <p>(b) <u>The results of the investigations shall be provided to and discussed with the landowner and occupier and provided to the Manager.</u></p> <p>(a) <u>The Consent Holder shall undertake further assessment and if necessary, soil and groundwater investigations in the area of Gloucester Park West between Onehunga Port and the Sea Scouts building</u></p> <p style="padding-left: 20px;">(i) <u>To identify any contamination into the Manukau Harbour</u></p> <p style="padding-left: 20px;">(ii) <u>To inform the design of leachate infrastructure.</u></p> <p>(b) <u>The results of the investigations shall be provided to and discussed with the landowner and occupier and provided to the Manager.</u></p>
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MITIGATION

34. During Mr Divers⁶ evidence he confirmed the lack of true mitigation being delivered by NZTA he spoke to representing a walkway/cycleway is not mitigation it is replacing what was already there.

CONCLUSION

35. This project while needed by this community and the region is delivering more problems than it is resolving. There is a real concern the negative impact on the residential/ industrial/commercial areas will be irreversible and the interchange provides a short term vision with long term negative effects.
36. Prioritise public transport in the area, protecting a corridor for a rapid transit link from Onehunga to the airport via the port as part of the project
37. An annual economic fund (min 5 years) to be provided by NZTA to OBA for marketing, promotional activities and to assist local businesses over the reconstruction and recovery time of this project.
38. The OBA asks that the application as it stands be denied

We ask that the application be declined but in the event that the BOI grants the consent we ask for the following, but not be limited to.

- Port land is not to be used for the road corridor
- Replacement Old Mangere Bridge be redesigned to accommodate light rail and connect via the port to the town centre
- Redesign of the Galway interchange to avoid congestion.
- Cut and cover to be increased in length to a minimum of 90m.
- The depth of the cut be increased and extended at the eastern end so as not to preclude the future option of light rail over the replacement Old Mangere Bridge
- Connections between Town Centre and port to be redesigned and improved.
- Connections between port and Town Centre to have a safe walking and cycling connection

- Genuine mitigation be carried out, not mitigation that just replaces existing public amenity that is being removed by the project to ensure that NZTA complies with the requirements of the Auckland Harbour Board (Reclamations) Empowering Act 1967 and the Auckland Harbour Board (Auckland Regional Authority Pikes Point East Reclamation) Empowering Act 1976
- Onehunga is bearing the brunt of this project and yet no meaningful mitigation has been offered nor has there been any divergence in the plans except for dropping of the trench section in front of the Landing.
- Interchange mitigation should be improved and not be limited to that currently planned in order to offset the ugly and dominate concrete walls in close proximity to the foreshore and recreational space.
- An economic fund be provided by NZTA to OBA for the duration of the project for marketing, and promotional activities to assist businesses affected by the project.
- That dredging be carried out around, underneath and between the wharves at the Port.
- All Transpower lines to be undergrounded in the Onehunga area

