

**Draft Kāpiti Coast District Council
Submission on MacKays to Peka Peka Expressway**

27 January 2011

Introduction:

The MacKays to Peka Peka Expressway proposal is part of the proposed Road of National Significance (RONS) between Wellington and Levin. It is one of seven routes proposed nationally and as such is a component of the Government's philosophy about how transport infrastructure should support its economic aspirations for the country.

The planned route and Expressway design will have a very significant impact on the Kāpiti Coast and the communities through which it passes. The project process is currently at the detailed investigation and design phase, with the formal decision stage to follow at the Board of Inquiry. The Kāpiti Coast District Council's role at this stage is to advocate strongly to ensure the local community achieves benefit in terms of access to the Expressway as an alternative route across the Waikanae River, that as much as possible expressway design supports rather than undermines the District's social, economic and environmental vision, and to ensure that adverse impacts are avoided, or appropriately mitigated. This includes seeking to minimise impacts on directly affected and adjacent property owners within the context of its wider statutory responsibilities. These include stewardship and protection of the environmental, social, economic and cultural wellbeing of present and future generations within the District, and its statutory responsibilities in relation to the Treaty of Waitangi and tāngata whenua.

The Kāpiti Coast District Council agreed to become a member of the Alliance in order to better advocate for the outcomes it seeks for the community in the investigation and design stage of the Expressway. Its membership of the Alliance will be reviewed at key milestones in terms of progress against objectives, including the point at which the RONS is lodged with the Environmental Protection Agency for consideration by a Board of Inquiry. Council will submit into that process on any relevant matter, including those matters that it considers have not been adequately addressed at any pre-lodgement phase of the project.

Eleven objectives were consulted on with the community as the framework for Council advocacy via the Alliance into this stage. These were subsequently adopted as thirteen guiding objectives for the Alliance Project Board. The Council's submission is made in the context of these objectives, which are the guiding framework in this process. Accordingly, this submission is divided into two parts. The first covers the specific matters out for consultation by the New Zealand Transport Agency (NZTA) in terms of route alignment. The second part raises matters which must continue to be addressed during the current investigation and design phases.

Any comment relating to detailed design or mitigation must be considered as an indication of some areas of focus for the next phase of work but not an exhaustive statement of issues to be addressed.

Part 1: Proposed Alignment

1.1 Provision of Full Interchanges at Kāpiti Road and Te Moana Road

The Council fully supports and welcomes the provision of these two internal full interchanges in these locations. It had previously opposed the proposal for only one interchange at Otaihanga on the grounds that it denied local community access to use of the Expressway, perpetuated the very significant problem of local reliance on only one river crossing on the current State Highway 1 route, had a major negative impact on the viability of the Paraparaumu Town Centre and created problematic development pressure in the Otaihanga greenbelt area. The shift to this current configuration removes these issues and risks in terms of adverse impacts. It is essential that these interchanges provide for full north/ south access.

There are consequences of these decisions which must be addressed in the next phase of work. These are:

- management of potential effects on Waikanae Town Centre and Waikanae Beach neighbourhood shops and centre. An Expressway interchange has the potential to act as a magnet for commercial and retail activity and to undermine existing centres. It is the Council's policy to support its existing centres for a range of social, economic and environmental reasons but although it has access to some regulatory land-use management tools these will be insufficient on their own. It is imperative that in the design of the interchange and the management of any adjacent land within the road corridor, that full attention is paid to addressing this issue and mitigating this effect;
- Te Moana Road is considered to be the most attractive major street in the District and is the bench mark for aspirations for other major routes. It will continue to be a two-lane, 50 kph road with a high level of planting amenity along the route. Any Expressway effect on the local road which undermines this is unacceptable to the Council or the community. The design of the interchange itself, the design and placement of signage, the design of the road across the Expressway corridor, and traffic management to deal with the local use of the interchange, must be to a standard which equates to and supports the qualities of this road.
- the performance of the access network (roads and walkways and cycleways) around the Paraparaumu Town Centre will need to be addressed in detail. Given the stage of planning for this area, the interchange in terms of detailed design and location must function in a way that is consistent with the Council's stated aspirations for Kāpiti Road and the wider Town Centre, for freight movements (see September 2009 submission) and for the highest possible design quality in all aspects. The management of effects must occur in a way that takes account of the Paraparaumu Centre as encompassing the area from east of the rail line along the Kāpiti Road Spine and Ihakara Street (including its proposed extension) past the airport and the Te Roto Drive industrial area to the start of the Paraparaumu Beach residential area.

- There are very significant stormwater management constraints at both Te Moana and Kāpiti Roads. These will have to be managed within the context of Council's policy of hydraulic neutrality and in terms of best practice around stormwater detention and storage. If this means a need for storage space which lies beyond the indicated 100 metre corridor, then the Council expects this kind of option is provided for rather accepting any compromises on the quality of any solution.

In addition, the design of interchange at Kāpiti Road and any bridge over the Wharemauku Stream should take the opportunity to develop a quality of design which is bold, iconic and references the community's values. The concept and quality, if not the particular design, of initiatives such as the Wellington City 'City to Sea Bridge' should be the focus. Because of the flatness of the coastal plain, the Expressway will impose a significant negative visual impact on the landscape, particularly on the highly valued views out to Kāpiti Island and back toward the escarpment. The Council is of the very strong view that a bold and innovative approach to interchange and bridge design, which is a great deal more than patterning of the surface of structures, is needed to mitigate these effects. This is especially important to the Paraparaumu Town Centre in terms of the community's vision for this centre.

1.2 Interchange at Peka Peka

The Council supports the provision of north facing ramps only at Peka Peka. It does not support a full interchange at this intersection because of the very significant risks and difficulties this brings in terms of managing commercial and retail development pressures around the immediate site, and the implications for general growth pressures in this area.

The Council's Development Management Strategy and District Plan policies provide for an urban edge just north of the existing Waikanae urban area, with low-impact urban style and density development to the south, and eco-hamlets and low density rural residential living and rural economic activities to the north. A full interchange would place pressure on this and would also increase pressure to expand the coastal village area at Peka Peka. Current residents have chosen to live in this area for its non-urban qualities and would generally not wish to see a major character change. They would continue to have access along the old State Highway (with an improved travel time as a result of reduced congestion) and would be able to join the Expressway at Paraparaumu or at Poplar Avenue.

There may be some local network effects with some Peka Peka residents travelling along Paetawa Road to the Te Moana Road interchange. These effects will need to be mitigated.

1.3 Waikanae North and Ngarara/ Smithfield Roads.

The Council welcomes the effort that has been made to bring the alignment of the Expressway as far east as possible in this area, to avoid adverse impacts on the regionally significant Te Harakeke Wetland and to avoid as much as possible, impacts on the sustainable urban design plan for this area. It remains an incontrovertible fact

however, that the Expressway has a profound impact on the developable land, design, intent and quality of the proposed long-term sustainable development vision for this area. The Council expects every effort is made to work with the landowner and with Council (in terms of District Plan policy requirements) to find positive best practice ways to mitigate what are significant adverse impacts in this area.

The Council does not support the closure of Smithfield Road. It supports the retention of the Ngarara Road connection across the Expressway and is of the view that a further connection closer to the Ferndale area needs to be formally explored and provided for to be consistent with the intent of District Plan Change 80. The potential for an east/west connection within the eco-hamlet area also needs to be explored.

Objective 4 (a) of the Guiding Objectives states clearly that:

'All existing and proposed east/west local road, cyclist and pedestrian connections are to be maintained consistent with existing KCDC Community Outcomes, Development Management strategy. Sustainable Transport Strategy and Cycle, Walkways and Bridleway Strategy...'

In considering Expressway design and alignment and connectivity decisions, it must be remembered that this area is intended for future low-impact urban development. The Council is not convinced that this framework is fully provided for in the work to date, particularly the sustainable design philosophy. A central aspect of that sustainable design is a high level of connectivity. The main connector routes for the area are formally included in the District Plan, from the current State Highway to Ngarara Road and from Ngarara Road through to Paetawa Road. The impact of the Expressway on the detailed roading and walkway design of the precinct plans set out for this area must be addressed at the next phase of design. It is imperative at this macro-design phase that these major connections are provided and that Nga Manu's desire for the connection past what is a District asset is provided for.

Given the emerging ecological corridor in this area, there is a need for very careful best practice mitigation, including protection of the important in-stream values. The Council expects a significant focus in this area at the next stage of work.

It is understood that at this stage the design assumption for the urban area provides road seal that maximises reduction of traffic noise but the question of using such a surface in the more rural areas has not been addressed. This area is intended for future urban development and it is essential that this level of service is designed and costed as part of the project at this stage. This may have the benefit of reducing the impact of other works required to reduce noise impacts, with the potential of a better amenity and environmental outcome.

Conversely, with the intent of this area being designed to a low-impact urban design standard, the Council does not support a standard approach to lighting which might be assumed for other urban areas (see below for further comment on design standards).

1.4 Waikanae between Te Moana Road and the River.

The Council is fully appreciative of the complexities in this area, the qualities of the local environment, the strong personal connection for many landowners, and spiritual and cultural values associated with the waahi tapu and urupa for tāngata whenua and the history of their extensive wider settlement in the area. For the latter there has been a long standing process of defending what is a touchstone area for Takamore Trustees and their families, and the wider Te Āti Awa ki Whakarongotai iwi members, as one of the few remaining physical areas expressing their history and cultural values over which they can have some level of formal jurisdiction, influence or ownership.

From the wider community's perspective, it wishes to have a second crossing over the Waikanae River, and many in the community have been prepared to support the overall Expressway concept because they have believed this crossing will be achieved more quickly this way. Irrespective of this view, the planning and consenting risks are high and could have a consequent timing risk, depending on the option chosen.

While the narrowing down of the options in this area has reduced the extent of direct impacts on property owners, there are still impacts on 15 properties under the western option, with 32 properties affected with the eastern option. The Council is very aware of the impacts on these households and families.

The western option also has impacts on an important eco-site (eco-site 170) .

The Council supports the eastern option proceeding and will only support the western option if the planning risks are reduced through tāngata whenua agreement that the road corridor can pass through the waahi tapu. Under the western option, the impacts on the eco-site would need to be fully mitigated through provision of an equivalent area of land elsewhere in the vicinity and binding provision of sufficient long-term resources to develop the site to an equivalent range of biodiversity and quality.

1.5 Waikanae River Crossing

Kāpiti Coast District Council expects provision of a bridge design which reflects its gateway status and minimises adverse effects on the in-river values and the quality of natural riparian environment along the river edge. Access must be provided across the river corridor for walkers and cyclists in the vicinity of the bridge, and along the river corridor. Design of the walkway below the bridge should maximise the safety and amenity.

The design and quality needs to recognise the important status of the bridge. It will have a major impact on the landscape and aesthetic and the design should be a great deal more than a simple engineering solution: it must be bold and iconic and reflect the values of the community.

1.6 Waikanae River to Mazengarb Road.

This area has a strong rural character which needs to be preserved. The Otaihanga Road crossing needs to be designed to fit this character and Otaihanga should be retained as the current simple winding road. Any safety issues can be resolved using

latest best practice that supports local character while reducing speed, rather than the road being straightened and widened. The latter approach would change the character of the area and increase driving at speed.

1.7 Waikanae River to Kāpiti Road

The Council appreciates that the detailed design and mitigation analysis for this part of the Expressway is yet to commence. It is important that the next stage of work, which will address the wider issue of access along and across the Expressway for active modes, outside the formal road crossings, recognises that many households living in this area live on relatively low incomes and have more limited travel choices. Access across the Expressway needs to be maximised, particularly to employment areas.

1.8 Kāpiti Road to Raumati Road

The interchange and general impacts on the town centre have been discussed above. As with the area between the River and Kāpiti Road, the Council appreciates that the detailed design and mitigation analysis for this part of the Expressway is yet to commence. It is equally important that the next stage of work addresses the wider issue of access along and across the Expressway for active modes, outside the formal road crossings and the Ihakara Street connections. The Wharemauku Stream route and the quality of the bridge crossing is a significant concern, for both access and stream values. Good quality access across the Expressway needs to be maximised, particularly to the town centre.

1.9 Raumati Road to Poplar Avenue

The Council supports the NZTA preferred route alignment which brings the Expressway out onto the old State Highway alignment north of Poplar Avenue and provides for access on to the Expressway at Poplar Avenue with south facing ramps. In supporting this alignment, the Council is very aware of the impacts and distress of directly affected property owners but it considers the wider impacts and implications are such that it must support this option.

The reasons for opposing the alternative route through Queen Elizabeth park are as follows:

- the alternative alignment brings the Expressway closer to a larger number of households and the Raumati South School and Te Ra Schools, who although not directly affected property owners will experience adverse impacts from noise, air quality and impacts;
- the increased severance effects on the Raumati South community;
- the effective loss of the Raumati Peatlands eco-site which has biodiversity and ecological values significant to the District. This also has some impact on the potential for the mutual ecological benefits arising from this site and its close proximity to the Poplar Avenue Wetland;

- alienation of the part of the Queen Elizabeth Park which, irrespective of perceived existing ecological and recreational values, has value to the local and regional community as part of the public open space estate;
- potential development pressures for commercial development on the edge of the park arising from the placement of an interchange further out into the park environment;
- visual impacts on the park of having one overbridge within the park area and one at the edge of the park further along Poplar Avenue, as opposed to one overbridge at the Poplar Avenue intersection;
- that the Raumati South rail station and associated parking needs can be provided for under both options;
- consenting risks and potential time delay, given the alienation of any park land must pass through a separate Reserves Act consenting process;
- the longer period of uncertainty for affected and potentially affected residents and a longer wait for access across the Waikanae River;
- the precedent this sets for design of infrastructure and potential developments through regionally significant public open spaces and the Department of Conservation estate. .

It is Council's understanding that the Regional Council and DOC may not be intending to submit at this stage. It is the Council's view that there is a need for more formal clarity and transparency about these agencies views at this current stage, in order for consenting risks to be fully assessed. There is a need for further clarity about the position the Regional Council will take in the Reserves Act process.

These stewardship/guardianship responsibilities and the statutory roles are matters for the Regional Council and the Regional Conservator to address as they see fit. However, at this stage Kāpiti Coast District Council would only consider the Queen Elizabeth Park option if the following has been provided for:

- that GWRC and DOC, in their role of stewards of this particular public open space estate, after full public consultation undertaken by them, provide formal resolutions from their respective bodies, on the potential use of the park for the Expressway. This consultation would have to take place before any NZTA application to the Board of Inquiry. Kāpiti Coast District Council would reserve the right to submit into this process;
- the planning and consenting risks are transparently addressed in relation to crossing Queen Elizabeth Park, subsequent to these resolutions being made available;

- provision is made for the equivalent area of park land lost along the route and the equivalent full area of the Raumatī Peatlands ecosite, to be set aside in the Raumatī South area in public ownership with reserve status;
- a binding agreement is in place that provides full mitigation funding for the development of this land over time, to equivalent environmental quality and biodiversity as that found on the current Raumatī Peatlands eco-site;
- a binding agreement exists with the Greater Wellington Regional Council that it will maintain this area to the required standards in perpetuity;
- mitigation of other effects.

1.10 Provision of Left On/ Left off Access

The issue of connectivity is a very important aspect of the community's aspirations around sustainable urban form and transport. The Council is of the view and has undertaken some sensitivity testing which suggests there is capacity to provide for some further left on/ left off access within the urban area while still preserving Expressway functionality for through traffic. Further work on this issue is required.

Part 2: Other Matters

2.1 Local Roads

Kāpiti Coast District Council at this stage does not have full confidence that the effects of the Expressway on the local road network are being adequately addressed, or that there is sufficient focus at this stage on addressing this issue and the modelling concern. The focus to date has been more on modelling the viability of the Expressway connectivity, rather than the impact on the overall network. While understandable, inadequate modelling could lead to poor design responses, a lower local level of service across the local network and the allocation of costs impacts to the local community where this is inappropriate.

The transport model zones and network representation are too coarse to allow adequate modelling of effects. This failure in the model itself must be resolved. The Origin/ Destination (O/D) modelling which allows assessment of travel time performance has insufficient O/D points to truly represent or assess outcomes. Once these have been expanded the analysis needs to be re-run with the revised model.

2.2 State Highway 1

The design and undertaking of works on the existing State Highway 1 is an integral part of the Expressway project. To date no specific work has been undertaken on this aspect, given the focus on defining the alignment and ensuring the NZTA gives certainty to the wider community and property owners on that issue. The Council does welcome the commitment to bring forward this work in the programme so that the implications and design solutions which will make this route fit for purpose as an arterial route can be addressed. It is important that this work is carried out in time to allow full costing of mitigation works alongside other aspects of the project and to allow the Council to assess development pressure impacts and management that may arise, as part of the District Plan review.

2.3 Impacts of the Alignment on the Remaining Dunelands and Wetlands

The dune system which exists within the proposed corridor is highly valued by a wide range of people in the community and has been a theme in consultation processes for many years. Objective 12 (a) states:

*‘That the project is designed and constructed in a manner that:
(a) minimises the loss of dune and wetland landscape through which it passes, including any remnant vegetation.’*

It is also of note that guidelines and policy has shifted somewhat in recent years in favour of wetland protection, with protection now being a national priority. It is clear from the proposed alignment that considerable effort has been made to avoid adverse impacts on wetlands and this is fully supported by the Council in terms of ecological outcomes and issues. The trade-off to some extent has been to throw the alignment more on to the dune system. It is an undoubted outcome that the dune landscape will be significantly affected.

It is also noted by Council that the project may have a deficit of sand which is very valuable from a construction perspective. It is Council’s clear position that this dune

system should be dealt with first and foremost as a landform that is of very high value to the community and that all effort should be made to protect it as the first principle. No situation should arise where analysis treats protection as being of merely equal or lesser value than use of the sand as a construction resource.

2.4 Design Standards

As noted earlier, the Council has high expectations in terms of the design quality and boldness of design for major structures as a way of mitigating the impact of the Expressway. The two illustrations below give an indication of the quality and impact of good design in the landscape that Council is seeking in the mitigation and design process. These examples are of footbridges and the Council will not accept standard engineering and design approaches, as exhibited with footbridges across the State Highway in places such as the Mana roundabout and Plimmerton, for example, as being at the necessary design level to mitigate the visual and landscape effects. It is interesting to note that the Minister of Transport opened the Taranaki walkway and it can be presumed endorsed the clear qualities of this design.



Above: Waiwhakaio Footbridge, Taranaki

Right: Rewa Rewa Footbridge, New Lynn, Auckland



The Council appreciates that the focus of the Alliance process is on an innovative approach to engineering and road design. NZTA design standards and guidelines should be used as guidelines and not as a fixed response to design issues. This includes the RONS 'Design Standards and Guidelines' that have been promulgated in the last year. If a more satisfactory outcome can be achieved by other approaches, then this needs to occur. The Council commends the Alliance and NZTA for taking this approach in this project.

It is recognised that at times, it is easier to fall back on these standards than to explore new avenues. It is also recognised the interface with NZTA technical staff not involved in the design work but with an accountability role in terms of the application of such standards, may at times be confusing and difficult. An example of this is Emerald Glen Road which, although linked to the RONS project, has not strictly been within the ambit of the Alliance. The Council has found this particular process difficult, and this has brought unease about the delivery of this design philosophy in a practical sense.

Kāpiti Coast District Council submits that within this current process, there needs to be a constant vigilance that a flexible and innovative approach is being taken. That vigilance will need to exist right through the construction phase, so that on the ground construction decisions are consistent with the intended design approach.

2.5 Property Purchase

The Kāpiti Coast District Council continues to be very concerned about the lack of progress in providing directly affected property owners with certainty about the property purchase process, and advancing that purchase process. It considers that purchase discussions should be proceeding now with land-owners whose property is completely affected **and** those landowners whose property is partially affected.

The Council also notes with concern, that the agreement that directly affected property owners should have access to independent counselling advice, does not appear to be fully understood or known by all NZTA staff responding to requests from property owners. This issue needs to be rectified urgently.

2.6 Mitigation

The next stage of work is focused on detailed design and mitigation. The Council signals at this stage that in its view mitigation will not always be achieved by design solutions and local works. The most obvious aspect of this is the potential impact of the Expressway on biodiversity levels and ecological health in the District. Where the alignment or detailed design solutions cannot maintain biodiversity levels in the local (immediate) context, the Council will seek to see an equivalent resource provided for and developed in that vicinity. This has been covered for example, in its comments on impacts on eco-site 170 and the Raumatī Peatlands. It expects this approach to be part of the mitigation analysis in this upcoming stage.

The Council notes that it appears that a report commissioned by the Environment Protection Agency indicates that the air quality impacts with the Waterview project in Auckland may have been underestimated by NZTA. It is a concern that the analysis of effects is robust, accurate and timely, so that the assessment of the mitigation needed is appropriate to the problem.

The Council emphasises that if, in order to mitigate effects, it is necessary to work outside the current 100m wide corridor, then this should be provided for. If the works needed for mitigation have a knock-on effect on the wider community then explicit consultation needs to occur.

Mitigation of effects must also address the quality of built structures (see earlier in the submission on Kāpiti Road and the Waikanae River Bridge.)

2.7 Analysis

The Council notes a concern that analytical methodologies are being refined as the project progresses and that there is a risk that earlier design options selection may not be as robust as later analysis. Therefore it is important that there is a willingness to both review the methodology and to re-check design solutions as that methodology is refined.

There is a need to ensure that the concerns of the Guiding Objectives can be clearly traced through the structure of any analytical tool (such as the Multi Criteria Analysis) and any final structuring of objectives under the Resource Management Act process.

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