

APPENDIX G – PEER REVIEW OF MULTI CRITERIA ANALYSIS



NEW ZEALAND TRANSPORT AGENCY

ŌTAKI TO NORTH OF LEVIN

MCA Peer Review

28 May 2018

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REPORT INFORMATION

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1. INTRODUCTION

This report has been prepared to document a peer review I have undertaken relating to a Multi-Criteria Analysis (MCA) prepared by MWH (now Stantec) on possible route for the Ōtaki to North of Levin project on behalf of the New Zealand Transport Agency (NZTA) in 2017. I am familiar with the area covered by the MCA having undertaken a brief desk-top scoping study of possible Levin Bypass options while working at Works Consultancy Services Limited in 1989.

My professional background includes close to 30 years of experience in designing and facilitating option assessment processes for various planning projects in New Zealand, utilising MCA as a tool to assist decision making. This experience is wide-ranging and has included assessing options for renewable energy developments, transmission lines, irrigation scheme canals, industrial waste-water discharge alternatives, coastal hazard adaptation strategies, a marae relocation study and the assessment of routes for major transport projects. My background in this area began in 1990 when I designed and facilitated a MCA process to guide the initial designation process for the recently constructed Cambridge Bypass Project in the Waikato Region. For that exercise we utilised the Cambridge Community Board as the Assessment Panel to choose between internal and external bypass options.

I have a particular interest in public participation models for MCA and have utilised community-based assessment panels to assist clients with their decision making on a number of complex planning projects. The most recent examples of community assisted decision making are the Whakatu Arterial Link Highway Project completed for Hastings District Council in 2014, and the Clifton to Tangoio Coastal Hazard Strategy 2120 where 100-year adaptation pathways were developed for nine vulnerable coastal communities in Hawke's Bay in 2017.

2. SCOPE OF PEER REVIEW

The scope of the peer review primarily involved a review of the Stantec authored document, *Ō2NL Community Multi-Criteria Analysis (MCA) Report – September 2017*.

There were no specific terms of reference for this peer review other than a general request from NZTA for me to examine the MCA process undertaken during 2017, and to provide them advice based on the evaluation of the work.

My peer review process centred around conducting a series of interviews with individuals who were involved in the Project Reference Group (PRG) to gain an understanding of the thoughts of those involved in the MCA process. Background reports available on the NZTA website and discussions with NZTA and Stantec staff have also assisted in providing me background information for the completion of this peer review.

3. MCA AS A TOOL TO ASSIST DECISION-MAKING

3.1 MCA BACKGROUND

MCA is a process that is now widely used for project evaluation throughout the world. It involves a structured process of defining, assessing and scoring different options in terms of a range of aspects, attributes or criteria which reflect the issues that need to be

considered to arrive at a considered decision. There is no “magic formula” or single approach for completing an MCA, although there is a standard methodology which is generally applied, as discussed below. Each MCA process I have facilitated has required a bespoke methodology, recognising that there are always different contexts, issues and constraints in play for any particular project.

It is also very important to note that MCA is only an aid to those making decisions, not a final decision tool on its own.

“MCA provides an open and traceable method of weighing up the advantages and disadvantages of the different options taking account of both tangible and intangible issues”¹.

There is a considerable amount of international literature and experience associated with MCA as a tool for assisting with decision making. For example, the UK Government developed a manual entitled “*Multi-criteria analysis: a manual, Department of Communities and Local Government, 2009*” (the “**UK Manual**”) prepared to provide guidance on the application of multi-criteria analysis techniques in that country. A well-known MCA technique in New Zealand is the “*Area, Corridor, Route, Easement*” or “**ACRE**” process applied by Transpower in selecting new electricity transmission alignments.

The UK Manual summarises the MCA approach, which they define as “Multi-Criteria Decision Analysis” (**MCDA**), as follows:

“MCDA is both an approach and a set of techniques, with the goal of providing an overall ordering of options, from the most preferred to the least preferred option. The options may differ in the extent to which they achieve several objectives, and no one option will be obviously best in achieving all objectives. In addition, some conflict or trade-off is usually evident amongst the objectives; options that are more beneficial are also usually more costly.

MCDA is a way at looking at complex problems that are characterised by any mixture of monetary and non-monetary objectives, of breaking the problem into more manageable pieces to allow data and judgements to be brought to bear on the pieces, and then of reassembling the pieces to present a coherent overall picture to decision makers. The purpose is to serve as an aid to thinking and decision making, but not to take the decision.”

The UK Manual describes the following eight detailed steps for applying MCDA, with further detail on the methodology and meaning of each of the steps provided in the Manual:

Step	Detail
1. Establish the decision context	Establish the aims of the MCDA, and identify decision makers and other key players. Design the socio-technical system for conducting the MCDA. Consider the context of the appraisal.
2. Identify the options to be appraised	

¹ Optimised Decision Making Guidelines – A Sustainable Approach to Managing Infrastructure. NZ National Asset Management Steering (NAMS) Group, 2004

3. Identify the objectives and criteria	<p>Identify criteria for assessing the consequences of each option.</p> <p>Organise the criteria by clustering them under high-level and lower-level objectives in a hierarchy.</p>
4. 'Scoring' ² . Assess the expected performance of each option against the criteria. Then assess the value associated with the consequences of each option for each criterion	<p>Describe the consequences of the options</p> <p>Score the options on the criteria</p> <p>Check the consistency of the scores on each criterion</p>
5. 'Weighting' ³ . Assign weights for each of the criterion to reflect their relative importance to the decision.	
6. Combine the weights and scores for each option to derive an overall value.	<p>Calculate overall weighted scores at each level in the hierarchy</p> <p>Calculate overall weighted scores</p>
7. Examine the results.	
8. Sensitivity analysis	<p>Conduct a sensitivity analysis; do other preferences or weights affect the overall ordering of the options?</p> <p>Look at the advantage and disadvantages of selected options and consider pairs of options.</p> <p>Create possible new options that might be better than those originally considered.</p> <p>Repeat the above steps until a 'requisite' model is obtained.</p>

One of the key points the UK Manual makes is the analysis can be framed in different ways, some more directly supporting the eventual decision, and some less so. It explains that the MCDA might be structured to:

- Show the decision maker the best way forward
- Identify the areas of greater and lesser opportunity
- Prioritise the options
- Clarify the differences between the options
- Help the key players to understand the situation better
- Indicate the best allocation of resources to achieve the goals
- Facilitate the generation of new and better options

² Scores represent how favourable an option is considered to be in terms of a particular criterion, aspect or attribute.

³ Weights represent the importance of a particular criterion in relation to other criteria.

- Improve communication between parts of the organisation that are isolated (e.g. finance, engineering, environmental); or
- Any combination of the above.

For some time NZTA has utilised MCA assessment processes for State Highway Investigation projects. This can be seen when the topic Multi-criteria Analysis is searched on the NZTA website where a range of MCA documents utilised for various NZTA projects around New Zealand can be found.

It is noted on the NZTA website that in April 2017 a document *#17-02 New Multi criteria analysis for transport business cases guidelines for consultation*, was released for consultation. As part of this peer review process I made enquiries regarding the status of these guidelines and was told they have now been withdrawn.⁴

For the Ōtaki to North of Levin project, the April 2017 draft MCA guidelines were referred to in the September 2017 Stantec MCA Report, where the draft guidelines were used as one of the different weighting systems (see page 26 of the report).

MCA is discussed as a tool under the Indicative Business Case section of the NZTA website, where the following extract is relevant (Note: for the purposes of this report I have highlighted some relevant passages):

Once the strategic assessment and context has been confirmed, a longlist of options for the activity is developed. For example, if the activity is an intersection upgrade, some options may be to build a roundabout, make it a grade-separated intersection, or add traffic signals.

These options are then evaluated to identify a shortlist – this process is sometimes called ‘optioneering’. As always, apply the principle of fit-for-purpose effort. If the investment proposal is low risk and low complexity, it may be that a frontrunner option is obvious.

However, you may consider holding a workshop to develop options; ideally, that would involve key stakeholders, who then get an opportunity to review and contribute to the draft longlist. Having discussions documented clearly and transparently ensures the assessment and development of options is well understood by all.

As options are developed and considered, apply some ‘filtering’ so that options where a fatal flaw is identified are not developed further. It is important to document when, and why, this is done.

Decide on the approach to be used for evaluating options. Multi-criteria analysis (MCA) is a tool that can be used to compare options and support a trade-off conversation, but a less formal or structured approach may work just as well for less complex activities. Criteria must be based on the investment objectives, but may also include more detailed criteria that are relevant to differentiate between options.

Options should be evaluated for their ability to deliver against investment objectives and other identified criteria, and also considering the following factors:

- costs
- risks (and uncertainty)
- time to deliver

⁴ Pers com Lonnie Dalzell, Senior Project Manager NZTA.

- interdependencies
- any other relevant factors.

The evaluation of these considerations must include discussions about trade-offs. For example, an option that isn't lowest cost, or doesn't deliver against all objectives, may be chosen because it has a more acceptable risk level than a lower-cost option that meets objectives.

In MCA, each option will be tested and ranked against the others.

This is typically done by the project team. You will need to consider how to keep investors involved in this process. For example, the project team could refine the stakeholders' first cut and bring it back to investors for agreement. It is important for the investment decision makers to be involved here, as they need to identify if the proposal is still aligned to desired goals, and because this is where most of the potential for trade-offs will be.

It is also useful to look at an indicative range of BCRs for the options as you work through the longlist to the shortlist.

Think about getting the right expertise for the type of risk so informed judgements can be made.

Create a shortlist from the longlist assessment. Ideally, this would be just two or three options, including a 'do–minimum' option that you will compare the other options against. It is good practice to aim for a single, clear preferred option at the end of the shortlisting exercise – then you only need to do detailed analysis of one option, and the investor(s) can be clear about what type of solution is proposed. However, because the BCA is principles–based, there will always be exceptions.

There may sometimes be investments where the advantages/disadvantages, risks and accurate cost estimates for two or three options are hard to distinguish, meaning more work is required to identify the best solution. Doing more work to understand the risks and identify a preferred solution will help to make an informed decision and tell a clear story to the investor(s) as to why you are recommending a particular way forward.

In summary, the following broad points can be made regarding MCA as a process in the context of this Peer Review:

- MCA is a common project evaluation methodology worldwide, and has been utilised to assist decision making in relation to project options in New Zealand for at least 30 years;
- While there is a general common framework of objective and criteria setting, option definition, scoring plus weighting, and sensitivity analysis there is no “one way” of undertaking MCA and a specific methodology and framework needs to be established for each project and context;
- MCA is used as a tool for assisting those making project investment and regulatory decisions to use – and it is not usually designed or appropriate for it to be the sole input to decision making;
- The group of people making decisions in MCA processes, i.e. undertaking the objective and criteria setting, option definition, scoring plus weighting, and sensitivity analysis, varies widely. Sometimes, as it is understood has normally been the case with NZTA sponsored MCA processes, a technical panel of relevant experts undertakes the evaluation. In other circumstances, elected Council representatives complete the evaluation. An increasing trend in MCA practice is to involve community

representatives and stakeholders in the evaluation process, in combination with input from the project sponsor and relevant technical experts; and

- NZTA released a draft guideline for MCA processes for consultation in 2017, but this has subsequently been withdrawn. However, the Programme Business Case guidance on the NZTA website still encourages the use of MCA in some circumstances.

3.2 RESOURCE MANAGEMENT ACT CONTEXT

Any option ultimately pursued for the Ōtaki to North of Levin project will have to be considered and a decision made under the Resource Management Act 1991 (RMA). As with other State Highway development projects it is expected that the designation provisions in Part 8 of the RMA will be utilised with the key section for decision makers being Section 171 (1) which is outlined below (with some underlining for relevance to MCA processes):

*When considering a requirement and any submissions received, **a territorial authority must, subject to Part 2, consider the effects on the environment of allowing the requirement, having particular regard to—***

- (a) *any relevant provisions of—*
 - (i) *a national policy statement;*
 - (ii) *a New Zealand coastal policy statement;*
 - (iii) *a regional policy statement or proposed regional policy statement;*
 - (iv) *a plan or proposed plan; and*
- (b) ***whether adequate consideration has been given to alternative sites, routes, or methods of undertaking the work if—***
 - (i) *the requiring authority does not have an interest in the land sufficient for undertaking the work; or*
 - (ii) *it is likely that the work will have a significant adverse effect on the environment; and*
- (c) ***whether the work and designation are reasonably necessary for achieving the objectives of the requiring authority for which the designation is sought; and***
- (d) *any other matter the territorial authority considers reasonably necessary in order to make a recommendation on the requirement.*

While there is no particular legal obligation for MCA to be utilised in the preparation of information to support a notice of requirement for a designation under Part 8 of the RMA, requiring authorities (such as NZTA) have often utilised multi-criteria assessment as a helpful way for considering and comparing a range of project options and their broad environmental and community effects.

In my own experience, both in undertaking MCA assessments and in making decisions as a Commissioner Chair (including in respect of designation projects for State Highway and significant regional highways) MCA can be a valuable tool for assessing various options. If the MCA is well designed and clearly reported it can:

- Provide guidance on narrowing options to proceed to further investigation and ultimately consenting, including provision of clear documentation relating to the potential environmental and community effects of each option;

- Provide the relevant stakeholders and community members with the opportunity to participate in a transparent process so they can contribute their respective knowledge and values to the assessment. Through such participation this provides a wider cross section of a community to have an opportunity to gain a fuller understanding all of the relevant factors associated with the options, and their comparative costs, effects and benefits;
- Provide part of the background record for the RMA section 171(1)(b) “assessment of alternatives” test, noting that an “adequate” consideration of alternatives under the RMA has been expressed by the Courts in various ways⁵, to include:
 - A fair, rational and systematic process;
 - A rigorous process conducted systematically and with integrity;
 - Consideration that is sufficient or satisfactory;
 - Sufficient investigations of alternatives to satisfy the proponent of the alternatives proposed;
 - An open mind to alternatives;
 - A business-like identification and comparison of alternative methods to satisfy a responsible proponent of the proposal;
 - Realistic alternatives to be represented, before the preferred option is chosen; and
 - The decision to be demonstrable and transparent.

I have utilised these principles in making my overall findings on the MCA process completed for the Ōtaki to North of Levin project in 2017.

4. BACKGROUND TO ŌTAKI TO NORTH OF LEVIN MCA EXERCISE

The Ōtaki to North of Levin project is a programme of State Highway investigations in the wider area from Taylors Road just north of Ōtaki through to the Manawatu River. The contract for assessing State Highway improvements for this sector of State Highway 1 was granted to MWH (now Stantec) in 2011. The investigation programme initially started with a comprehensive scoping report completed in July 2012⁶ which assessed the whole State Highway study length including utilisation of a MCA process undertaken by the Project Team which lead to the identification of preferred corridors for further investigation. Figure 1 overleaf is an extract from this 2012 MWH scoping report.

⁵ Note this is my own summary of principles enunciated in various decisions I have read.

⁶ Ōtaki to North of Levin Expressway Scoping Report, MWH July 2012.

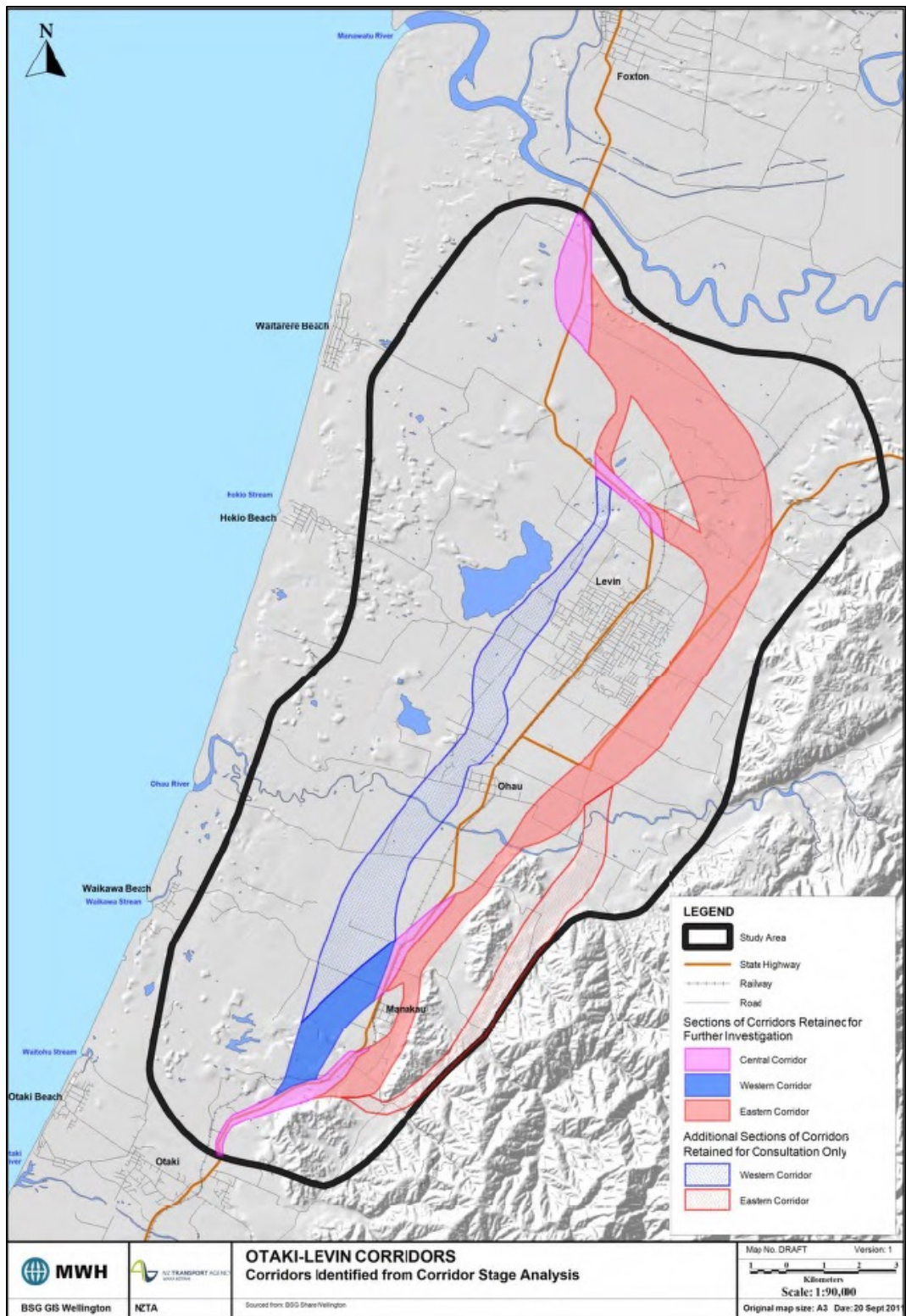
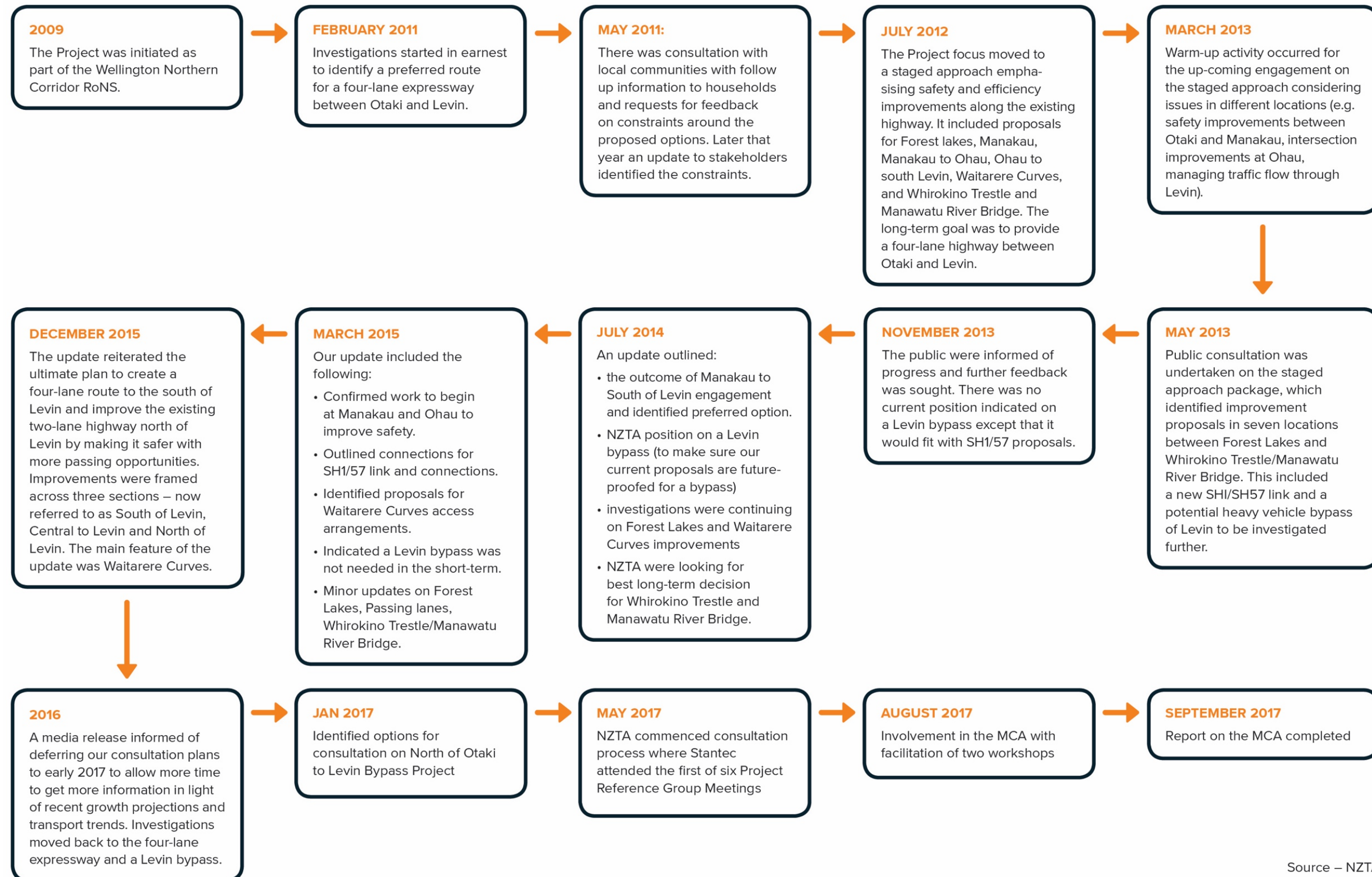


Figure 1: Ōtaki-Levin Corridors identified in the Ōtaki to North of Levin Expressway Scoping Report (July 2012)

Investigations over the ensuing years were assessed as more discrete projects associated with different parts of the overall study area, as shown on the flow chart in Figure 2 below⁷.

⁷ Figure sourced from NZTA

ŌTAKI TO NORTH OF LEVIN PROJECT PHASES



Source – NZTA

Figure 2: Otaki to North Levin Project Phases

As can be seen from Figure 2, a considerable amount of investigation work and consultation has been undertaken by NZTA and their consultants in the period 2011 to 2017 as part of assessing a possible Road of National Significance (RoNS) expressway between Taylors Road in Ōtaki and the area north of Levin. It is evident from this flowchart, and from my discussions with both NZTA and Stantec project personnel that there was a stage between 2014 and 2016 where there was limited community engagement despite technical work continuing.

The 2017 MCA Process was part of a ‘refreshed’ approach to community and stakeholder engagement for the project, led by NZTA who wished to take a more inclusive approach as part of reassessing Ōtaki to North of Levin expressway options. This was explained in the September 2017 Stantec MCA Report as follows:

As part of a ‘refreshed’ approach to community and stakeholder engagement, the Transport Agency wished to involve a broader range of people, particularly from community and stakeholder groups, and Iwi representatives, in investigating route options. To ensure that any process addressed community expectations, the options to be considered would need to involve a representative range of routes, including some that may have been removed from consideration earlier in the technical investigations. This was to include some options that individuals and groups had suggested as part of the most recent engagement processes.

It is understood that NZTA wanted to move forward to work closely with the community and other stakeholders on the project. Alongside the MCA Process, there have been two rounds of public consultation carried out by NZTA in the form of submissions on the route shortlist and the preferred route (in June 2017 and January 2018).

Another document recording this “refreshed” community consultation effort by NZTA is *Ōtaki to North of Levin: Engagement Summary Report – May-July 2017*, NZTA, August 2017. I have included a summary chart of engagement highlights from this report in Figure 3 below.

Ōtaki to north of Levin

ENGAGEMENT HIGHLIGHTS

May - July 2017



HOUSEHOLDS CONTACTED

13,000 newsletters sent to households, businesses and land-owners at the start of the engagement period



YOU SAID...

"A west side bypass of Levin would provide a shorter route, but ground conditions will be technically challenging, although not in-surmountable. Historical and cultural issues will be significant to Tangata Whenua."



WE WILL: Give further consideration to possible route options to the west of Levin.

"Integrated cycleway/native plantings off-highway would be a huge benefit to residents and local biodiversity which would be a positive offset to the construction."



WE WILL: Take this into account for all the options that are considered.

"To the east of Levin and Manakau is so developed, being able to fit an expressway down this narrow strip is a huge issue. It's where all the top quality soils and greenbelt residential developments are."



WE WILL: Consider how to mitigate effects to maintain peoples lifestyle and productive land.

FEEDBACK SUMMARY



Route suggestions

Some people talked about routes to the east of Levin, many others would rather see a route to the west of Levin. It is important to find a route that minimises the impact on residential and agricultural land. Suggestions about continuing the project further north.



Bypass

Strong support for the need to bypass Levin and other townships/villages. Some concern about removing passing traffic and potential trade from Levin, but the majority recognising the need to reduce congestion and have heavy vehicles out of town.



Safety

Positive comments about the recent safety improvements, but many more comments highlighting other concerns, like dangerous intersections, the narrow bridges and lack of safe passing opportunities.



Values

There are a number of features unique to the Horowhenua District: highly productive soils; village character; marae; rural lifestyle; spiritual connection between Lake Horowhenua and the Tararua Ranges; heritage buildings.

NEXT STEPS

- Develop one or more alignment options (Aug / Sept 2017).
- Talking to and working with affected property owners (October 2017 ongoing).
- Engage with the public on the option or options (late 2017).
- Recommend an option to the Transport Agency Board for endorsement (early 2018).
- Construction likely to begin from 2021.

Figure 3: Ōtaki to north of Levin Engagement Highlights from the Engagement Summary Report (May – July 2017)

As set out in Section 5.11 (page 17) of the NZTA Engagement Summary Report a key element of NZTA's refreshed approach entailed the establishment of a Project Reference Group (PRG):

A Project Reference Group (PRG) was established for the project. The PRG met on 11 May 2017 before the start of the engagement period and again on 14 June 2017 during the engagement. At the time of writing, another meeting is planned in for 17 August 2017, with the intention being that the PRG continue to meet throughout the duration of the project. Members of the PRG will also be invited to take part in the Multi-Criteria Analysis (MCA) process which will feed into the decision making for option selection.

The purpose of the PRG is to provide key stakeholder and community input into the decision-making process during the investigation phase of work, and develop a close working relationship with the project team for further stages of Ō2NL. The intention is that the PRG will feedback information to their respective organisations and communities, ensuring stakeholder awareness of the process and project.

Representatives of the following organisations and community groups who were invited to attend the PRG meetings are listed in the Engagement Report as:

- Department of Conservation
- Heritage New Zealand (formally New Zealand Historic Places Trust (NZHPT))
- Kāpiti Coast District Council
- Horowhenua District Council
- Greater Wellington Regional Council
- Road Transport Forum NZ
- Road Transport Association
- NZ Heavy Haulage Association
- Automobile Association
- Federated Farmers
- NZ Police
- NZ Fire Service
- St John Ambulance
- KiwiRail
- Cycle Aware Manawatu
- Manakau District Community Association
- Waitarere Beach Road Residents Association
- Waikawa Beach Road Ratepayers Association
- Levin Business Networking Group
- Poroutawhao Residents Group
- Ōtaki Community Board

The NZTA Engagement Report also outlines that the following iwi/hapū that were identified through the engagement process:

- Ngā Hapū o Ōtaki
- Te Kotahitanga o Te Iwi o Ngāti Wehi Wehi
- Te Iwi o Ngāti Tukorehe
- Ngāti Pareraukawa
- Ngāti Kikopiri
- Kereru Marae
- Ngāti Huia ki Huia
- Ngāti Huia ki Matau
- Te Rūnanga O Raukawa
- Muaupoko Tribal Authority

The PRG had a series of meetings during 2017-2018 which are relevant to consider alongside the MCA Workshops (see the flowchart Figure 4 below).

PROJECT REVIEW GROUP MEETINGS

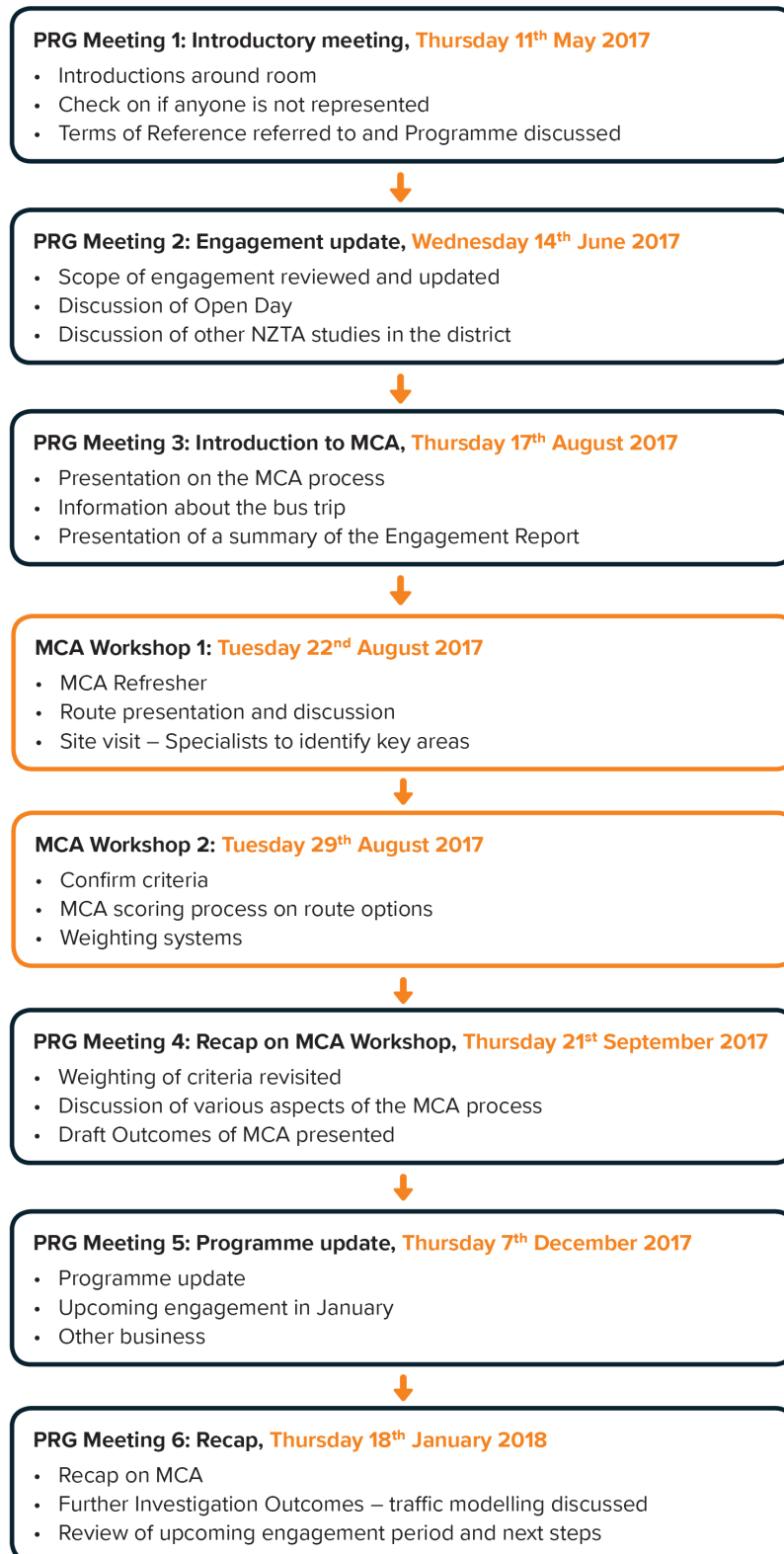


Figure 4: Project Review Group Meetings



An analysis of meeting attendance from the records of these PRG meetings show the following patterns:

- PRG Meeting 1 was attended by 27 stakeholder representatives from a broad range of groups, including eight iwi/hapū representatives and representatives from three community / ratepayer groups (Waitarere Progressive, Poroutawhao Community Group and Manakau District Community Association);
- PRG Meeting 2 was attended by 13 stakeholder representatives with no iwi/hapū groups represented with representatives of Waitarere Progressive, Poroutawhao Community Group and a representative from a newly established Group - the East Arapaepae Residents attending;
- PRG Meeting 3 (the key Introduction to MCA session) included 20 stakeholder representatives and was well attended by representatives from Waitarere Progressive, Poroutawhao Community Group, Manakau District Community Association and East Arapaepae Residents. Four Horowhenua District Council representatives attended, including three Councillors and Ngāti Tukorehe was the only iwi/hapū group represented. Another feature of attendance at this meeting was attendance by three business representatives from Federated Farmers, Economic Development Board and the Business Networking Group;
- PRG Meeting 4 (the recap on the MCA Workshop Process) was attended by 22 stakeholders including good representation again from the Community / residents groups, with an attendee from the Muaopoko Tribal Authority;
- PRG Meeting 5 (the programme update) was attended by approximately 15 people according to NZTA. I do not have a breakdown of who attended this meeting as I have been advised that meeting notes were not taken at this meeting; and
- PRG Meeting 6 was attended by 15 stakeholders, the majority of which were East Arapaepae Residents and Horowhenua District Council representatives. No iwi/ hapū group representatives attended.

Two MCA evaluation Workshops occurred in between PRG Meeting 4 and PRF Meeting 5 where the scoring and weighting of options was undertaken.

Records show these Workshops were both well attended by a wide range of stakeholders including community/resident group representatives, Horowhenua District Councillors, along with iwi/hapū representation.

5. PEER REVIEW PROCESS

5.1 DOCUMENT REVIEW

The peer review process commenced with a review of the key project 2017 MCA document and other project documents available on the NZTA Project website⁸. The

⁸ <https://www.nzta.govt.nz/projects/wellington-northern-corridor/Otaki-to-north-of-levin/technical-reports/>

review of these documents guided questions during the interviews I held with those involved in the MCA Process, as discussed below.

5.2 INTERVIEWS

On my request, NZTA provided contact details for several individuals who were involved in the 2017 MCA Process. The aim was to provide me with the ability to talk with a spectrum of people with different interests in the Project. The individuals nominated were:

- Lindsay Poutama, local resident and Ngāti Tukorehe and Raukawa Rūnanga
- Rob Warrington, local resident and Muaupoko Tribal Authority (MTA)
- Heather Heron-Speirs, Poroutawhao Community Group
- Barry Petherick, East Arapaepae Residents

Interviews were carried out either face-to-face or via phone in mid-April 2018. The duration of the interviews was between 1–2 hours.

An interview was also held with Sylvia Allan (Allan Planning and Research Ltd) and Phil Peet (MWH now Stantec New Zealand) who were the lead consultants in the MCA Process. The focus of the questions for this interview were informed by various matters I had gleaned from my initial project document review.

At the interview with Barry Petherick, it is noted that his neighbours Pam Robinson and Otto Bats also attended. Pam Robinson had also been involved in the 2017 PRG and MCA process and both are members of the East Arapaepae Residents Group.

Although the questions asked at each interview were open-ended in nature, I organised the responses gathered in a summary table using the following three categories: what the individual felt was positive; what was concerning and what they suggested could be considered for future MCA processes. I sent a draft of these summary tables to the interviewees for their review/comment.

Confirmed summaries of the interviews with Lindsay Poutama, Rob Warrington and Heather Heron-Speirs (as updated after their feedback) are provided in Appendix A.

Barry Petherick did not specifically respond to the draft table which I sent to him for review, and instead as he had indicated was his preference at our meeting, he forwarded a more substantive feedback document to me on 20 April 2017. This document set out a range of quite specific issues and concerns regarding the MCA process and included several matters that I would have found difficult to assess on their face, without a response from NZTA. Accordingly, and so as to ensure a fair process, I forwarded this document to NZTA and asked them to respond on each point under the following three categories:

- Agree the comment/criticism is fair but not material to the final MCA results and shortlisted routes chosen – with brief reasons
- Agree the comment/criticism is fair and material to the final MCA results and shortlisted routes chosen – with brief reasons
- Disagree with the comment/criticism – with brief reasons



The NZTA response was received on 26 April 2017 and included a separate response from Isthmus Group relating to landscape assessment matters which had been raised. I have added in the NZTA response to the East Arapaepae Residents document so the matters can be compared and this, along with the Isthmus response, is provided in Appendix B.

A further document was received from the East Arapaepae residents on 2 May 2017 relating to productive land issues prepared by the Tararua Growers Association and NZTA have also provided responses to the specific additional concerns raised in that document (see Appendix C).

I received two further communications from Barry Petherick just as I was finalising this Peer Review Report. The first was a query on 17 May 2018 regarding a November 2016 Options Assessment Report which is on the NZTA website. The concern here related to the fact that during 2016 a prior MCA process had been held involving NZTA, their consultants and local Councils and that a Workshop meeting note had requested confidentiality. A concern was also raised that this prior process had not been declared to those involved in the subsequent 2017 process, leading to a disingenuous process. I enquired about this with NZTA and their response⁹ is outlined below:

I can confirm that the NZ Transport Agency was investigating route options in 2015 and 2016, and that the 2016 investigations were of route options between Otaki and north of Levin. This followed on from investigations undertaken in 2011/2 and prior to that in 2000's, 1990's etc.,

The 2015 and 2016 options were undertaken on what was then a normal basis, i.e. an independent team of experts with NZTA and other stakeholders. These were undertaken on the same basis as MCA workshops that involved the PRG in 2017 where we asked attendees to keep the information to themselves (in confidence) so that the broader community is not then exposed to a broad range of option assessment processes without any context and to avoid/reduce causing significant community uncertainty.

I can confirm that the 2017 MCA process was a restart. We undertook the assessment afresh with an open mind, involving experts and the local community. Our minds were not closed to options and we had not predetermined the outcome. The idea of the process was to have a genuine root and branch relook at the options and we were and today still remain open to adopting the best performing option.

The second communication was received on 18 May 2018 and attached a Peer Review Report regarding Social Impact Considerations commissioned by a Manakau resident. NZTA have confirmed to me that they have received this report and they have referred it to their Social Impact Assessor, Amelia Linzey from Beca. I have not looked at this Peer Review in any detail due to its late receipt, but would encourage NZTA to provide a response to each of the matters raised (as they have done for matters raised through my overall MCA Peer Review) and that this is made available on an open basis.

⁹ Email from Greg Lee dated 18 May 2018

6. PEER REVIEW FINDINGS ON MCA PROCESS

6.1 REVIEW METHODOLOGY

I have ordered my Peer Review findings as follows:

- A summary of positive comments received from the MCA participant interviews and my reading of the documents;
- A summary of concerns raised in the MCA participant interviews (not including the detailed concerns from the East Arapaepae Residents, which I deal with separately);
- A summary of the suggestions from the MCA participants interviewed which could be incorporated into future processes;
- A commentary on the issues raised by the East Arapaepae Residents and the NZTA response by key topic area; and
- A MCA process design section where I pose and consider some key questions around the MCA and subsequent processes.

6.2 POSITIVE COMMENTS RECORDED FROM INTERVIEWS

The full list of positive comments received on the NZTA 2017 MCA process for this project are set out in the tables in Appendix A so I have not needed to repeat them all here verbatim. Key positive points from the three who completed the interview feedback forms I prepared (Lindsay Poutama, Rob Warrington and Heather Heron-Speirs) are:

- All these MCA participants ranked the overall process positively – between 7.5 to 9 on a scale of 1 to 10;
- The clear leadership and co-ordination by NZTA staff (as opposed to delegation to consultants) throughout the 2017 community engagement period was appreciated;
- Early involvement through the PRG process prior to the MCA workshops was supported;
- The bus tour looking at options was useful;
- Having a wide range of route options back on the table, even though the western routes had previously been discarded was a good process; and
- The iwi/hapu representatives considered it was important that they had the opportunity to pre-score the Māori cultural values criteria, with input from elders and others in their community prior to the evaluation workshops.

6.3 CONCERNS RAISED DURING INTERVIEWS

Again, the full list of concerns from the three interviews are recorded in Appendix A. Key summary points are:

- Some concern that the archaeological and cultural information layers were not robust when the process started, and with work being undertaken without the full knowledge of the iwi/hapu;

- Some concern that there was not enough time or discussion for the iwi/hapu representatives to engage with the wider community people involved in the MCA process to fully explain the issues and concerns with the western routes;
- A concern that the traffic modelling not being fully available at the MCA workshops meant that Māori may have be unfairly blamed as the only reason that the western routes have not been advanced in the shortlisting process by NZTA;
- Some concern that the MCA workshop process did not provide enough time to do justice to the scoring and weighting process; and
- Some concern that all relevant participants were not fully engaged at the start of the PRG process, but acknowledgement that NZTA welcomed additional parties being added as the process evolved.

6.4 SUGGESTIONS FOR IMPROVEMENT

Several suggestions for improving future MCA processes were made by the three interviewees who completed my interview summary tables, some of which arise out of the concerns already noted. Suggestions include:

- Ensuring an environment is created in the PRG where sensitive issues can be openly discussed
- Provision of more time to understand what the issues with the options are prior to scoring them
- Use of a process for reducing the long list of options down before the MCA scoring process to ensure those with “fatal flaws” are discounted

6.5 EAST ARAPAEPAE RESIDENTS AND THE NZTA RESPONSE BY KEY TOPIC AREA

I have reviewed the document entitled *Identified Errors and Concerns with the MCA process and Related Material* document provided by some of the East Arapaepae Residents via Barry Petherick (provided in Appendix B). It has been very useful to me to have these concerns so clearly written down and I would like to sincerely thank those who put this together for their time and commitment in preparing this document. Residents in this area are in the difficult position of having participated in the MCA process where the results have been a contributor to the decision by NZTA to prefer an eastern corridor for the proposed expressway route. They are critical of some elements of the process associated with:

- The constraints mapping
- The choice of corridors
- Representation on the PRG
- The definition of the assessment criteria
- The bus trip
- Scoring and weighting biases
- The speed of the process

Separate concerns were subsequently provided to me relating to productive land issues in a document prepared by the Tararua Growers Association (provided in Appendix C).

Sound Peer Review processes allow for those being critiqued to have an opportunity to respond and I have provided this opportunity to NZTA as part of my review process.

I have assessed these concerns and responses, alongside other comments made by PRG participants that I have interviewed, to ascertain whether any of the issues raised are of such materiality that they would undermine the overall value of the MCA process undertaken by NZTA and its consultants. This is important as the MCA exercise has clearly been a key process contributing to the identification by NZTA of a preferred eastern corridor for the expressway (along with specific short-listed routes).¹⁰

This is the reason why I specifically asked NZTA to consider whether, in their view *they agree the comment/criticism is fair and material to the final MCA results and shortlisted routes chosen* – with brief reasons. (my underlining)

I have applied the same test myself as part of this Peer Review Report and after a careful read of the issues raised by the East Arapaepae Residents, the responses from NZTA, and the project documentation I have available to me, I do not consider any matters raised meet this materiality threshold.

While there is some obvious disagreement about the details of the MCA process design, the range of routes assessed and criteria utilised for the MCA scoring, these concerns were primarily in the context of differences of opinion rather than any fundamental process weakness.

Specifically, in relation to the key areas of concern summarised above, my view is:

- The constraints maps were discussed at PRG Meeting 2 and a link provided in the meeting minutes, and these maps appear to have been updated based on comments received and further information as the process progressed;
- The corridors finally assessed in the MCA process were a combination of historical routes which been identified in previous studies and there was a reasonable process of discussing these and including additional route options through the course of the MCA process. New information regarding constraints with some of the corridors emerged through the exercise due to the range of people involved with different knowledge, which is a normal part of a MCA process;
- NZTA have confirmed they invited over 30 organisations to attend the first PRG meeting in early May 2017 (i.e. it was targeted and was not just by word of mouth). While this appears to be a reasonable cross section of parties to begin a community based MCA process, it is clear the East Arapaepae area was not appropriately represented, and it was fortunate that they had been included by PRG meeting 2;
- The concerns raised regarding the evaluation criteria are noted and in my experience this part of MCA processes is usually the most difficult to finalise. I note for this

¹⁰ See “Project update on shortlist options for public consultation, NZTA, February 2018”

Community MCA process 12 evaluation criteria were recommended and finally utilised. This is a large number, and my own preference is to have a maximum of eight criteria as too many criteria can dilute key decision matters. While it is evident that all criteria were not universally agreed by the MCA participants, some changes to the criteria were made following discussion and the participants did agree to proceed and conclude the scoring and weighting exercise using these. In addition, in my opinion all of the key issues (including noise) were able to be considered under at least one criterion;

- I consider the process would have benefited from having a noise specialist involved to explain this effect as this is a key community issue for these types of projects, and I note NZTA accepts this was a fair criticism;
- The pre-scoring by “experts” including mana whenua with knowledge of tangata whenua cultural values is a relatively common approach, and in my experience, can be a useful MCA technique. It is apparent that some of the pre-scores scores were amended after debate, and that where a final score was not agreed, both candidate scores were recorded and utilised in the analysis;
- The sensitivity analysis undertaken in the report is comprehensive and was clearly designed to address any actual or perceived bias in the weighting processes through looking at a range of perspectives;
- While NZTA have responded to the concerns that there was not enough time to complete the MCA process by setting out that they attempted to provide an efficient process, I do consider a little more time would have probably been beneficial to all parties.

My overall view is NZTA undertook the process with good intent, transparency and with appropriate specialist advice and input, which I expand on further below.

6.6 COMMUNITY MCA PROCESS DESIGN FINDINGS

I have outlined my Peer Review Findings by addressing a number of questions, as follows:

Was the MCA a valid process, with reference to good practice?

I have included in Appendix D of this report the MCA power point presented by Sylvia Allan at a briefing session on the MCA process at PRG Meeting 3 on 17 August 2017. This PRG meeting was the one immediately prior to the two MCA Workshops that were held later in August 2017.

This MCA process outlined in this power point generally accords with my own views and experience with what makes up a good MCA process. In particular, I agree with the key factors that validate MCA, as set out below:

- Inclusion of a variety of stakeholders
- Seek alternative views – weighting systems
- Openness and honesty in the expression and capture of beliefs
- Sensitivity analysis (or several weighting systems) to explore robustness of results

- If no clear preference is identified, there should be a willingness to probe further, possibly by other means (e.g. Benefit-cost analysis, pair-wise comparisons).

I have formed a clear view in this Peer Review that the MCA process undertaken by NZTA and documents in the September 2017 Stantec Report for this project was a valid process with reference to these criteria.

In terms of the third element, I consider all participants have contributed with openness and honesty through both the MCA process as documented, and also through the opportunity and willingness to participate fully and frankly in this Peer Review.

Did the Community MCA process add value?

There is no doubt in my mind that the establishment of the PRG and the inclusion of a range of stakeholders in the MCA process was a positive initiative by NZTA and added value to the project. As I understand, this is a relatively new approach for NZTA. Traditionally the Agency has run its MCA processes utilising their project team subject area experts to undertake decision analysis assessments for State Highway projects (optioneering, criteria definition, scoring, weighting etc) as an input to their final business case decision making process.

My own practice in the MCA area over the last 10 years has progressively moved towards a more open stakeholder process, with community representatives included on assessment panels. This approach enables a more open and transparent process during the optioneering phase of a project, and a “three-way” sharing of knowledge and information between community stakeholders, the project proponent and the experts engaged on a project.

In my opinion, this type of process has led to a more robust and defensible MCA process to assist a project proponent to make its final project decisions.

By being included in the MCA process, stakeholders have an opportunity to apply their knowledge and to have influence as options are developed and assessed. More often than not, in my experience, some participants do not agree with the final outcome and recommendations of a community panel-based MCA assessment process, in relation to their own interests or values. This is to be expected and needs to be recognised by everyone involved at the outset.

At the outset of the process it is critical that participants are fully aware that the MCA process is a decision tool and guide only. Ultimately, as explained in Section 2 of this Report, the project proponent with financial responsibility (in this case, NZTA) has to make the final decision on any project they wish to advance through the RMA approval processes, after considering all relevant project factors. I consider this was clearly and fairly outlined in the last slide of the MCA PowerPoint delivered by Sylvia Allan at PRG meeting (see Appendix D) where it was clearly outlined:

MCA should be used as a tool to probe the dimensions of a problem and inform decision-making. The process should guide the decision-maker, but not make the decision for them.

This decision-making right is balanced by the need for any route chosen for a new State Highway project to be tested through the RMA decision making process, where the NZTA as the requiring authority and any interested parties and stakeholders have public participation rights. The key legal test, as outlined in Section 3 of this Report as set out in section 171 (1) (b) of the RMA, is “*whether adequate consideration has been given to alternative sites, routes, or methods of undertaking the work*”.

What were the positive elements of the Community MCA process?

There are many positive elements of the MCA process undertaken in this case, which I support as good practice including:

- A thorough and well publicised “fresh” engagement stakeholder briefing process led by NZTA in May 2017, with all past options on the table again;
- The establishment of the PRG, with what seems to me to be a reasonable range of initial representation, and with the mindset by NZTA to welcome in and include other interested parties as the process evolved. This meant that by PRG Meeting 2 held in June 2017 most relevant parties seemed to have been represented, and by PRG Meeting 3 and prior to the evaluation workshops there was a good number of community representatives involved;
- The decision to re-open the previously discarded western routes for further consideration at the start of the refreshed assessment, and the willingness by NZTA to add in additional routes for assessment as the MCA process progressed;
- The utilisation of technical experts to assess and report to the PRG on their specific discipline areas, with an indication of their view on how the various routes scored in their professional view;
- The decision to allow iwi/hapu to pre-score the Māori cultural value criteria to allow those representatives on the PRG to have input from their wider networks; and
- A thorough sensitivity analysis looking at different weightings.

Where might the Community MCA process have been improved?

In my view, there are some elements of the MCA process that might have benefited from a different approach. Some of these elements have already been canvassed above in Section 6.5 as feedback from the other participants that I interviewed. In their responses NZTA have also outlined some areas where they consider specific criticisms of the process are fair.

From my observation, the more inclusive Community MCA approach undertaken by NZTA for the Otaki to North of Levin Expressway process sits somewhere between the approach that NZTA has traditionally used (based around a project technical team MCA assessment with selected stakeholders) and a full community “blank sheet” MCA approach.

The full “blank sheet” approach is where firstly, with technical advice and guidance, the community focused Assessment Panel develops and tests a long list of options itself afresh to shortlist preferences. Secondly, through a facilitated process the Assessment

Panel also considers and agrees the decision-making criteria, prior to undertaking weighting and scoring associated with the agreed short-list.

While ultimately not material to the overall outcome in my view, I consider that another two months in the programme from the initiation of the “refreshed” community engagement launched in May 2017 to the end of the MCA evaluation workshops would have been beneficial for a study area of this size.

The participants I interviewed all felt the process was too rushed and in my experience four months from the initiation of a community process to the completion of MCA scoring and weighting for a project of this scale does introduce a lot of time pressure on everyone involved, given the complexity of the issues with this project. Two additional PRG sessions would have added value in my view, as this would have enabled more time and opportunity to:

- Review together as a group the large number of potential route options that had been previously identified over a 25-year period, with an additional process step to develop and refine these to a more manageable and realistic “long list” for full MCA evaluation, after taking into account new information and knowledge;
- Allow those participating to feel more comfortable and have more time for discussion together about issues affecting the scoring (for example, as shown in Appendix A, where Mr Poutama and Mr Warrington both felt that the residents would have had more questions around understanding the cultural issues and values), and
- Understand and potentially refine the MCA criteria further to ideally get to an “agreed set” before undertaking the scoring and weighting evaluation process.

What did the September 2017 MCA Report Recommend?

The September 2017 Stantec MCA Report arrived at both eastern and western routes as “Options Shortlisted for further Investigations – see My Figure 5 below:

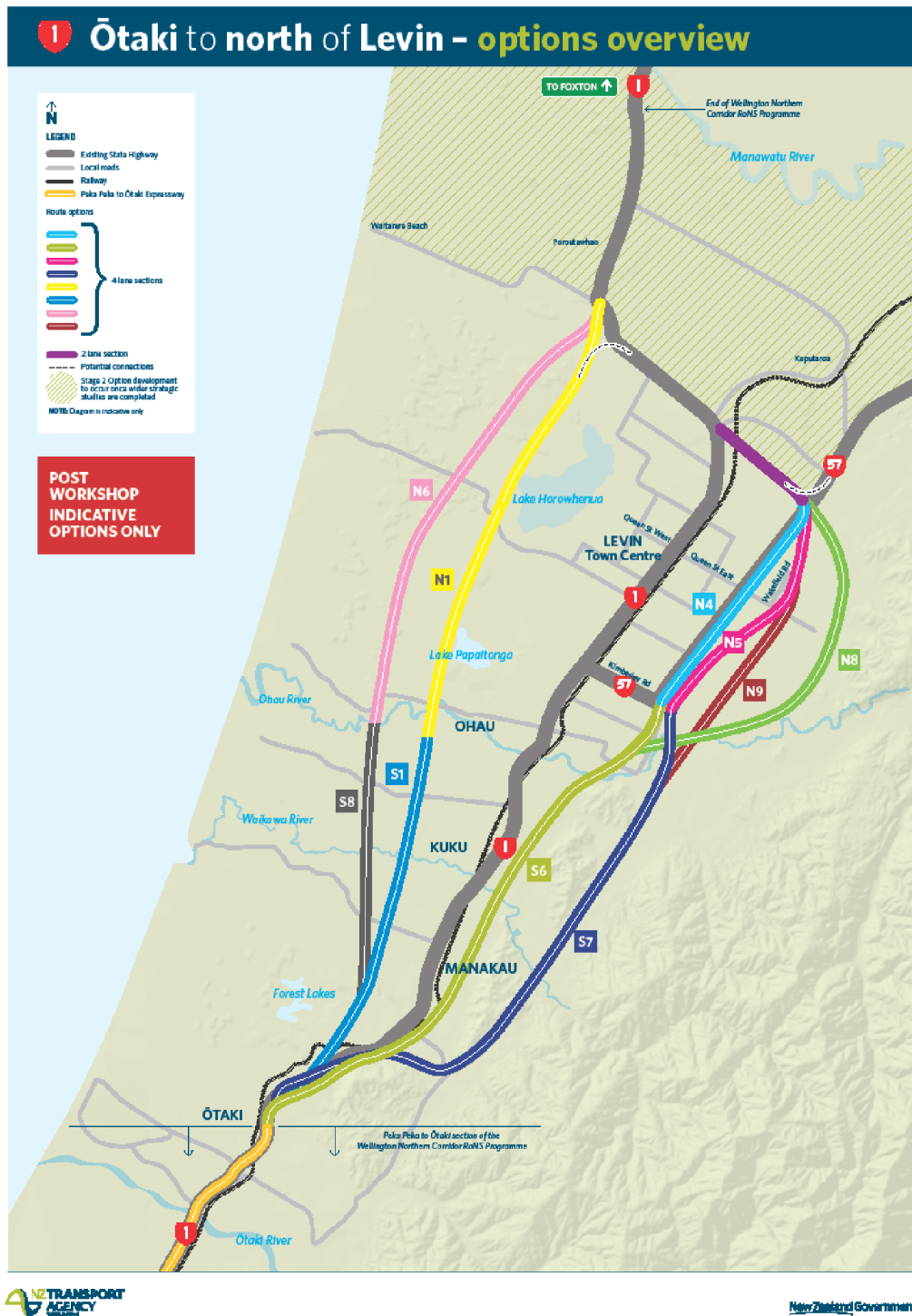


Figure 5: Shortlisted Options from the September 2017 Stantec MCA Report

In relation to this shortlist the MCA report states at page 33 that:

From the earlier discussion of the scoring outcomes, it is clear that there is no option which is free of issues, problems or environmental impacts. This analysis has



provided a formalised, transparent and structured means of comparing the various options.

The process has identified some considerations that require further detailed analysis before the options are shortlisted further. These are:

- **Tangata Whenua implications:** Some of the routes were considered to be fatally flawed from the workshop analysis due to their potentially significant impact on sites of significance, areas of previous occupation and because they involve extensive areas of Māori land. Further discussions with local Iwi are needed to better understand these impacts and whether western options should proceed to public engagement processes.
- **Linkages to key areas:** Some of the routes did not appear to have the potential to provide adequately for access from the expressway to the key destinations of Levin or SH57 north of the study area. The combined routes need to be modelled using the Ōtaki to north of Levin Traffic Model to confirm this assessment and to determine if the routes would meet the project objectives.
- **Constructability:** Some of the alignments go through parts of the project area which have not been considered in detail previously. Further information on these routes will need to be collected and the engineering and constructability aspects considered to ensure that a road can be built along the route sections indicated.
- **Additional Ecological Advice:** Further investigation will also be undertaken on bush areas along corridor N4 due to uncertainty as to the appropriate scoring.
- **Review of Productive Land Criterion:** Subsequent to the workshop, as a result of concerns raised with the Transport Agency, the basis of and scoring for the productive land criterion were reviewed. This is the subject of a separate brief report, included as Appendix P.

The outcomes of the proposed actions above and the MCA outcomes will provide information to assist the Transport Agency to make a decision on which options should proceed to public and stakeholder consultation. (my underlining)

How does the MCA contribute to final expressway decision making?

It is important to note that NZTA has not used the September 2017 MCA report to make any final route decisions.

Instead the 2017 MCA was used by NZTA as an input, along with other further information to define their preferred eastern corridor, within which a range of possible short-listed routes are being considered through further community consultation. The preferred eastern corridor and shortlisted routes that NZTA has consulted on during the first quarter of 2018 are shown below in Figure 6.



Figure 6: Shortlisted options (from the Community Flyer prepared by NZTA)

As explained in the purpose of the February 2018 consultation document:

The O2NL community multi-criteria analysis (MCA) report (September 2017) explains the process of identifying and then assessing a long list of corridor options. This memorandum relies on that 2017 MCA, summarises the MCA process and the outcomes from the ensuing phase of investigation of the shortlist of options that lead to a shortlist of options for public consultation. Once the public consultation



process is complete, the feedback from that process will be integrated with the investigations and reported in an Indicative Business Case report.

In terms of additional information post the 2017 MCA process the February 2018 NZTA memorandum states that further traffic modelling had been undertaken. This additional information has demonstrated that:

- *When considering the project objectives, the western options do not generally perform well as compared with the eastern options in respect of safety and reducing travel time across the three key routes;*
- *The western options do not provide good access to potential economic growth locations or connectivity to Levin; and*
- *The eastern options are much better performing options from a transport performance perspective and provide much better opportunities to connect to SH57 and SH1 while supporting the economic growth objectives of the District Council.*

As some participants in my Peer Review process commented, this finalised traffic modelling information would have been useful in the MCA process itself. On the other hand, it also illustrates that final short-listing decisions need to take into account all information as it evolves. While having the traffic modelling completed before the Community MCA process would have been very useful, it is understood that some preliminary information was provided by Stantec during the 2017 process which would have showed the general trend.

The second area of further investigation relates to follow-up discussions that NZTA had with Ngāti Raukawa and Muaupoko regarding Tangata Whenua Cultural Values, as recommended in the September 2017 MCA Report. The sensitivity of the area west of Levin township in terms of the Māori cultural values is well documented and understood and was raised as an issue by all the participants I interviewed.

The NZTA February 2018 consultation memorandum provides a further update on this matter, as follows:

Ngāti Raukawa and Muaupoko have advised of significant concerns with the western options and have stated that they will oppose all routes that are located west of SH1 and Levin. They confirmed that these options traverse and effects areas of cultural significant, including urupa, marae and land holdings. These concerns are exacerbated in relation to options that traverse sand dunes, or are close to or impact on lakes and water course. Our experts advise that the western options will also affect a dense area of known site of cultural significant and highly unusual dense clusters of Te Tura Whenua Māori land holdings.

Ngāti Raukawa and Muaupoko have also outlined concerns about options located to the east of SH1 (and Levin) as they will effect land holdings, water ways (that feed into Lake Horowhenua and Lake Papaitonga) and some areas of significance. However, they advise that as compared with the western options, these issues will be able to be resolved thorough design and mitigation.

A similar situation arose in the Hastings Northern Arterial Project in Hawke's Bay that I am very familiar with, where the Hastings District Council sought to designate an arterial

highway route that traversed Māori Freehold land. Ultimately, this matter was appealed through to the Privy Council¹¹, which made the following finding:

The Treaty of Waitangi guaranteed Māori the full exclusive and undisturbed possession of their lands and estates, forests, fisheries and other properties they desired to retain. While, as already mentioned, this cannot exclude compulsory acquisition (with proper compensation) for necessary public purposes, it and the other statutory provisions quoted do mean that special regard to Māori interests and values is required in such policy decisions as determining the routes of roads. Thus, for instance, their Lordships think that if an alternative route not significantly affecting Māori land which its owners desire to retain were reasonably acceptable, even if not ideal, it would accord with the spirit of legislation to prefer that route.

This Privy Council decision was instrumental in the Hastings District Council looking afresh at options for a link between the Havelock North area through the Whakatu industrial area to the Hawke's Bay Expressway, with an objective that any route options did not traverse Māori land or any identified waahi tapu sites.

This was the subject of the community led Whakatu Arterial Link MCA which I designed and facilitated between 2013 and 2015 and that subsequently led to the designation of an alternative route which met this objective.

For the Ōtaki to North of Levin Community MCA process undertaken in 2017, these issues were discussed in the workshops, in particular whether the western routes should not be progressed at all in the MCA scoring due to potential fatal flaws associated with tangata whenua cultural values. However, it was decided by the group to continue with scoring these western options, with a decision made to note on the scoring tables where a potential fatal flaw existed.¹²

7. CONCLUSION & RECOMMENDATION

In conclusion, the findings of this Peer Review are outlined in Section 6 of this Report and it is unnecessary to summarise these further or repeat them here.

I am grateful for the time and effort put into those I interviewed, and for the further information provided to me by representatives of the East Arapaepae Residents, NZTA staff and their consultants. This has assisted me in the completion of this Peer Review.

If the project proceeds to next stage (following selection of a preferred option), I would recommend that NZTA maintains and involves the PRG as an advisory and reference group in the preparation of a Detailed Business Case and also with any consequent RMA approvals processes. This would ensure continuity of community engagement in future decision processes, and notably in the refinement of the preferred route option.

¹¹ Privy Council Appeal No. 43 of 2000

¹² See Workshop 2 Meeting Notes – Appendix C of Ō2NL *Community Multi-Criteria Analysis (MCA) Report – September 2017*



APPENDIX A

Meeting Summaries

Meeting Details

Heather Heron-Speirs

April 5 2018 1.30pm

Positive comments on the MCA Process	Concerns regarding the MCA Process	Suggestions for future MCA Processes
<p>Had some poor past experiences with NZTA on the Waitarere Curves, Whirokino Bridge and the Poroutawhao School Proposed passing lanes projects and was very pleased with the new / fresh approach from NZTA around community consultation and involvement in option assessment for the Otaki to North of Levin project – as it was refocused early in 2017.</p>	<p>Some concern that the scoring workshop sessions ran out of time, but in the end the group got through everything they needed to. One or two extra sessions may have been useful, but it was a significant time commitment for people as it was, and this needs to be balanced.</p>	<p>Would be good to be able to write down the rationale on the scoring tables of why an option scored highly or lowly on a criterion when compared to the other options.</p>
<p>Colour coding / banding for scoring was good to show relative values instead of hard numbers. e.g. using a spectrum of colours. This was a good idea as it avoided the misleading impression that numbers have a true mathematical value. Suggest use the colour coding / banding approach for future projects</p>	<p>While the process of each expert “pre-scoring” their topic area saved time and was useful, for some expert areas there were novel issues to be scored and how to do this needed to be discussed better before scoring values were finalised. e.g. the way soil types were graded needed allowance for land already built upon.</p>	<p>NZTA could look at the Te Whare Tapa Wha assessment model in the context of cultural impact assessment (e.g. was used on Waitarere curves by Ngati Huia).</p>
<p>Saw a real strength that the senior NZTA staff leading the project took responsibility for key community engagement and consultation rather than consultants / contractors. Considered the process was run with high integrity and with good transparency (which is a considered to be a fundamental and critical matter for good processes).</p>	<p>It was not good that NZTA’s team members for expressway, who were involved in the process, included people who were known to NZTA as having a bad reputation with the community (Poroutawhao Community Group) through our experience at Waitarere Curves. Firstly, having them there knocks confidence in the integrity of the process, and secondly, the willingness to put them in those positions when NZTA knows we had severe problems with them, including knowing significant specific detail of our objections and their seriousness, strongly suggests disrespect.</p>	<p>The establishment of the PRG seemed to be inclusive from the start with the obvious stakeholder groups involved, but there were opportunities for other interested parties to join through the process as local networks talked about others who should be involved. i.e. everyone seemed welcome and NZTA actively sought ideas from members on who else might benefit from involvement when the PRG was first established.</p>

Positive comments on the MCA Process	Concerns regarding the MCA Process	Suggestions for future MCA Processes
<p>Had heard the bus tour was very useful and informative, and provided opportunities to see many areas and to think about other possibilities for routes. Other routes were added in for consideration after the bus trip and further discussions at the PRG</p>		
<p>It was a good thing to put all the possible corridors / routes back on the table including the western routes which had previously been discounted, as this enabled those participating to understand the pro's and con's of each of the routes, the opportunity to feed in comments and most importantly, the reasons why.</p>		

Overall process rank 9 out of 10: The process had high integrity, was inclusive and responsive and a big change from past processes – NZTA had listened to past concerns.

Meeting Details

Lindsay Poutama, Ngāti Tukorehe and Raukawa Runanga

April 3rd 2018 2pm (by phone)

Positive comments on the MCA Process	Concerns regarding the MCA Process	Suggestions for future MCA Processes
It was beneficial to have this community consultation process led by NZTA as Project Managers rather than technical people.	The project had a gradual breakdown in communication in 2015/16 so the MCA Process had to pick up things afresh.	To continue to utilise Project Managers and Facilitators who are good communicators as the intermediary between the community and the technical team.
Appreciated the new approach and the communication that was done to involve him from the beginning of the MCA Process.	There was a desk-top archaeological report done before May 2016 where Ngāti Tukorehe were not informed or notified. This created tension.	To try and ensure that regular communication on projects is provided to the community prior to commencing a MCA process.
The inclusion of a bus trip where everyone involved in the MCA Process could visually understand the setting and where each of the routes was going to go.	Some relied on the tangata whenua map produced by consultants and did not realise that there are some additional sites that would need to be avoided but are not on the map. These layers were only going to be exposed the deeper into the process we went.	To ensure that local iwi are aware of any reports being completed which relate to their history and are consulted and have input into any reports.
The MCA Process was robust, and they were encouraged as tangata whenua to lead on cultural aspects, and that tangata whenua and archaeology viewpoints were given due weighting according to their importance.	The result of the MCA Process left a feeling that some in the community blamed the tangata whenua for the routes being pushed to the east which was only one factor and unfair.	To ensure that everyone involved in the MCA Process understands the reasoning behind each routes ranking to avoid tensions in the community. From what was observed the people who were part of the process had a clear understanding, the issue was created around how this was presented to those in the community who had no understanding of the process or had no input into the robustness of the discussions.
There were three people responsible for the tangata whenua ranking which was beneficial to be able to get a clear response on the day that was fair (as they had consulted with elders and community previously).		Maurie Love was not from the area so if the process was repeated, it would have been better for consultant team to include someone more local.

Overall Rank: 7 ½ or 8 out of 10. Would have scored higher but they inherited some past poor relationships

Meeting Details

Rob Warrington, Muaupoko Tribal Authority (MTA)

April 4th 2018 10.30am (in person)

Positive comments on the MCA Process	Concerns regarding the MCA Process	Suggestions for future MCA Processes
Happy with the process and the presentation of the options.	There was little questioning of their tangata whenua / mana whenua viewpoints at the workshop by others in the community and more discussion would have helped them to show the rationale for the scoring.	To ensure that an environment is created where people are comfortable to ask about potentially sensitive viewpoints e.g. of a cultural nature.
Although MTA came to the MCA process a bit later, this did not affect their opportunity to be involved in the process.	Did not get contacted at the commencement of the MCA consultation (as a small iwi, but they have tangata whenua and mana whenua status). Acknowledges that it is possible that MTA were capacity stretched, so may not have been able to engage at the early stage.	To more thoroughly check lists of key stakeholders to ensure that as many are included from the start of the process as possible.
Appreciated the approachable nature of the NZTA Project Managers.	No option to give a rating beyond a 5 as a 'fatal flaw'.	To ensure that there is sufficient time at the beginning of the workshop to guide people through the process and what the numbers mean. Muaupoko acknowledge that as they were consulted later in the process, it is natural that their view was that there was less time for certain actions.
The opportunity was given for Lindsay Poutama and him to pre-score for the Maori cultural criteria and be clear about their numbering. This was appropriate and appreciated.	The process was quite short for the significance of the project and there were some late nights.	To capture the reasoning / rationale behind the numbers in the MCA report, as a narrative description.
Felt happy that the western route options had been added back into the conversation as their cultural reasoning had not changed since the project first commenced.	It would have been beneficial if the traffic modelling had been concluded prior to the MCA process to demonstrate how some routes would not resolve traffic issues. This key reason for rejecting the western routes was not initially well understood, meaning Maori were being unfairly blamed as the only	To potentially look to reduce the options before the MCA process commences if there are 'fatal flaws'.

	reason for dropping the western options.	
	The result of the process was that there is now some division and unfortunate 'undertones' in the community, especially through social media.	To ensure that conclusions of key reports such as the traffic modelling are completed prior to the MCA process.

Overall Rank: 9 out of 10 – as they were happy with the result after being involved late in the process.



APPENDIX B

Barry Petherick Letter and NZTA
Response

Identified Errors and Concerns with the MCA process and Related Material

1) *The Constraints map*

- 1.1** Little information was distributed before the workshop. For example we were not able to have access to study the updated constraints maps before workshop 1, apparently because they were considered drafts; and so while we were able to see them at the previous PRG meeting we were unable to study them at home and as we had a very limited time we were still requesting amendments and requiring a lot of explanations from the specialists between the first and second workshop. See email 1 at the end.
- 1.2** In spite of our efforts some of the Ohau River Reserves were left off some key maps. This gave us no confidence as these reserves were the ones that ended up under corridors. For example, Kimberley Reserve was still left off the Landscape and visual maps, which seemed to impact on the landscape scores.

2) *Corridors poorly chosen*

- 2.1** We have concerns that the western corridors were a sham. We did not get to see the proposed corridors until the first MCA workshop. The western corridors that were chosen seemed to be a very poorly aligned and gave us the impression that they were just put in to keep us happy, and that no trouble had been taken to choose them seriously.
- 2.2** Some members of the community got together with local knowledge and suggested some better corridor options before the second workshop, but a very limited part of these options was looked at. It was quite arguably justified by the fact that there was not time to do the analysis on the new corridors, and yet other new corridors were chosen, and some on the west seemed a lot less viable. The community had to overlay all the constraints maps and use local knowledge to come up with 'better' corridors as constraints combined map 20 had not been available for us to see at that stage. However, when map 20 came out see the following quote from an email to Mr Dalzell from a community member; *"Also it is frustrating to see on Map 20, combined 1, how clearly it appears that the western corridors have not found a best way through the constraints. I have attached the same map that I sent to you before the second workshop, showing some western corridors that some east of the Arapaepae residents proposed back then, that still seem to look like a much better option when overlaid onto Map20, combined 1."* See also email 2 at end.

NZTA response and comment

1.1: Disagree with the comment/criticism

Adequate information to allow the MCA process to proceed was provided to attendees. The PRG was briefed on the MCA process prior to the first workshop. The first workshop discussed the process and specifically provided opportunity to check and provide new information and routes, including a site visit. The constraint maps were discussed at PRG meeting #2 and a link to the online version of the maps was provided in the meeting minutes. The email provided relates to the process for updating the constraints maps, and the PRG were invited to provide information for inclusion. Attendees to the MCA workshop were provided with the updated 'draft' maps for them to comment on - a number of changes were made based on comments received.

1.2: Disagree with the comment/criticism

It is not necessary for a constraint to be repeated on multiple constraints maps for that constraint to have to be taken into consideration. The constraints maps were used to help generate route options but the technical specialists used site visits and all relevant constraints as basis for discussing a MCA rating score at the workshop. The Kimberley Reserve is identified on the 'Ecological Area of Significance' and 'Landscape features' constraints maps. Other Ohau river reserves are located outside of the study area. An additional small "Kimberley Reserve" identified by Pam Robinson was actually still road reserve but was identified for its ecological values.

2.1: Disagree with the comment/criticism

The western route options presented at Workshop 1 were based on historic studies plus geometric engineering design opportunities given known constraints. This was the same process used to identify the eastern options. This was explained at Workshop 1 and following discussion additional corridor options were added for consideration at Workshop 2. A composite of the constraints maps was developed and provided post workshop to help explain the process.

2.2: Disagree with the comment/criticism

The options sent from Pam Robinson were received and assessed by the project team prior to workshop shop 2. The far western option was included in the final options. However, the options that skirted Lake Horowhenua were not added as their MCA performance would be dictated by their effects relative to and on the Lake, and these option types were already being considered.

2.3 On the bus trip the specialists were gasping at some of the corridor options on the west as they had just taken them from old reports and not realized that they had been developed for housing since.

2.4 Some corridors on the west were scoring 5 and higher as they went over the Meatworks or lake Papiotonga etc. While at the workshop it was discussed that it would be possible to move the corridors over, so they would score lower, this was never really applied, showing that there was no will to really seriously try and find a western option.

3) The criteria generally.

3.1 Noise should have been there. The presented criteria were discussed at the PRG meeting 3, and at Workshop 1 of the MCA. Amongst a number of questions raised was the issue of noise and it was requested that this be treated as a separate criterion in its own right. NZTA made a decision on this and it was conveyed to the PRG at the start of Workshop 2. The decision was to include it under Amenity in the single combined criterion Severance, Recreation and Amenity. There was vocal opposition to this by community members. There is no further reference to noise in any MCA notes and there is no evidence to suggest it was ever considered in the MCA process.

3.2 The first listed project objective is about improving health and safety on the local highways. In building an expressway we are introducing in the form of noise another very significant health and safety concern. It would be irresponsible to disregard its importance. There will be a health cost to the community and research from overseas concludes that that cost will be very high. It is not good enough to say it will be mitigated. The New Zealand Standard NZS 6803 is sadly outdated with its suggested sound levels eg 67dB (which is at a harm causing level) and residents here are well aware of the poor mitigation adopted on the Kapiti Expressway.

3.3 Effect on property value could also have been included and the community had asked for this quite a lot.

4) Representation at the MCA was not organized well.

4.1 Those attending were basically the same as the PRG

4.2 Representation seemed to be by word of mouth, ie people got involved if they happened to hear what was going on, and then if they said they represented a group they could contact the project team and ask to come along.

4.3 Horticulture was not represented at the MCA and PRGs. Tararua Growers were not aware and so missed out. Others not represented include the Kuku east area, and the whole of the northern 2 lane section.

2.3: Agree the comment/criticism is fair but not material to the final MCA results and shortlisted routes chosen

The site visit was for all participants not just the community. This shows the value of the bus trip in identifying elements that cannot be found through a desktop study.

2.4: Disagree with the comment/criticism

This was discussed at the workshop and where it was able to be agreed that the constraint could be avoided and not introduce additional effects then this was reflected in the score. The options were all geometrically viable and could not just be tweaked to avoid a feature such as the meatworks as they would then have other impacts. No option went over Lake Papiotonga.

3.1: Agree the comment/criticism is fair but not material to the final MCA results and shortlisted routes chosen

Agreed that this was discussed in depth. Ultimately a majority decision agreed to continue as one criteria. There were a few PRG members that maintain this should have been separated. Noise was considered under the social/ community criterion as part of amenity values. This is fully documented. Noise effects are also reflected in the 'impacts on dwellings' criterion, and to some extent in the landscape criterion.

3.2: Disagree with the comment/criticism

One of the project objectives is safety and this relates to reducing traffic accidents on road network. This is not thus about health and safety in the sense discussed. Effects on residents is considered through the 'social/community' and 'Impacts on dwellings' criteria. These issues will continue to be investigated in the next phases of the Project.

3.3: Disagree with the comment/criticism

Property values were asked to be included in the MCA process at Workshop 1. Issues were considered to be adequately covered by the 'Impacts on dwellings' criterion.

4.1: Agree the comment/criticism is fair but not material to the final MCA results and shortlisted routes chosen

The community participants were based on the attendees of the PRG, although additional people were included at the request of some members of PRG.

4.2: Agree the comment/criticism is fair but not material to the final MCA results and shortlisted routes chosen

Refer to the above.

4.3: Agree the comment/criticism is fair but not material to the final MCA results and shortlisted routes chosen

The MCA workshops were attended by a specialist in soils (Lachie Grant), farming groups and Federated Farmers. The MCA specifically considered effects on Productive land. Noted that not all communities were represented at the MCA. The involvement of the PRG in the MCA process was to help improve community understanding of the process and to help with the MCA. This does not need attendance by all community groups.

4.4 We would not have been represented if we had not found out through community word of mouth and got ourselves organized and asked to attend.

5) **The bus trip/site visit.**

5.1 This was not comprehensive as the bus driver was not able to make turns well and also because time ran out. This meant that the western routes were visited as planned but by the time we were coming back up the eastern side it was decided that the bus would leave out Manakau north rd. Kuku East Rd, Kimberley Rd, Tararua Rd and Queen St. Ie many people were unfamiliar with some of the areas and did not get to see the eastern areas at all, causing a bias.

Our Concerns with Individual Criteria.

6) **Social/Community/Recreation Criteria**

6.1 This was where Noise was supposed to be included. No effort was made to consider effects of noise at all. No maps or noise data were used.

6.2 There was no noise expert in attendance at any of the MCA workshops. Community members have discussed the need to talk with a noise specialist and while this has always been responded to with a “we can get one along”. This does not appear to have happened at any engagement or other event. See email 1 at end. While we mostly asked verbally, I can send more examples of our documented concerns if you need them.

6.3 Severance, amenity and recreation are all different and yet very important things, so they should not be grouped as the scores can cancel each other out. We argued that point before the workshop and Ms Allan’s response was to use a scale of low medium and high to give each part a limited amount of transparency. We argued for a scale that equated to 5 values but again got nowhere.

6.4 We did not feel as a community that we were able to have any significant input into the scores. Included is the quote from Ms Allen’s workshop background note. *“In preparing these notes, it was assumed that this criterion would be of considerable significance to the community, and that those taking part in the MCA process would be providing considerable input to the discussion and scoring, due to their own expertise as residents or other stakeholders. Thus, these notes are brief, as they were intended to “kick off” discussion rather than form a comprehensive assessment on their own.”* However, this was not the case. Ms Allan just wrote the score she had chosen up on the board and basically very politely told us what we thought. All the representatives from the

4.4: Agree the comment/criticism is fair but not material to the final MCA results and short-listed routes chosen

See above. Known groups were invited to be part of the PRG. It is noted that the East of Arapaepae Road group seems to have been created during the June 17 NZTA engagement period.

5.1: Agree the comment/criticism is fair but not material to the final MCA results and short-listed routes chosen

The project team and technical specialists had visited the eastern routes during previous stages of the overall ON2L investigations. Technical specialists undertook additional site visits as necessary. Members of the local community were able to undertake additional site visits if they wanted to. It is unlikely that this would have resulted in a bias.

6.1: Disagree with the comment/criticism

Noise was considered under the social/ community and effects on dwellings criteria.

6.2: Agree the comment/criticism is fair but not material to the final MCA results and short-listed routes chosen.

Noise was considered under the social/ community and effects on dwellings criteria.

6.3: Disagree with the comment/criticism

Grouping of criteria does not mean that severance, amenity and recreation issues are not identified or understood. The method used to group the criteria was transparent and replicable. The scale used was a 5-point scale, being low, more than low (or low/moderate), moderate, moderate/high, and high (note that this was included in the MCA report Appendix I, and the workshop record, but not fully explained in the report itself) .

6.4: Disagree with the comment/criticism

The scores for the ‘Social / community’ criterion (and the rankings for the individual components within the options) were adjusted in response to comments during the workshops, changing the scores presented by the technical specialist in that area. The changes increased the severity of reported potential impact.

east did not feel that we were listened to or that our attitude to lifestyle amenity was being understood.

6.5 Time pressure and a feeling of reluctance from the group to spend longer on the discussion in which we seemed unable to achieve anything was also very frustrating.

6.6 Because the lowest scores were the ones carried through N2, N5 and N9 only get a 3 for the analysis, whereas we had pushed strongly for higher scores, and at least had been able to get a 3 / 4 recorded. See this quote from an email; *"We do not understand the difference in the scores for amenity for N4, N5 and N9? Why can't the community be listened to, they should have all ended up as 4s. While the 4s were entered in the minutes, now due to taking the lowest score N5 and N9 have now dropped back to a 3 in the analysis."*

6.7 There were concerns that amenity was judged by dwelling numbers not aesthetic value. For example, beside SH57 should have a lower amenity than in the best areas of the greenbelt residential subdivisions and in Riveredge Terrace etc. Our understanding is that areas next to SH57 already have high road noise, and so will be affected less as they already have low amenity. However, for amenity Ms Allen gave N4 a moderate, and N5 and N9 a low/moderate, with the comment "less people directly affected"

6.8 Another concern is that the score for N8 has become a 3 in the analysis tables when it was a 4 in the minutes, at M,M,H surely that is a 4? In fact, it is a 4 everywhere except table 4-10 where it has dropped to a 3 without explanation.

6.9 In the minutes published in appendix C and the notes we have, N9 had an M for severance. However, this has been changed to L/M in the appendix I background notes with no explanation.

6.10 If the 3 is used for N9, then maybe all the others need changing, eg N4 has a M,M,L and gets a 4, so surely N9 at M, L/M, M should get a 4 too. We suspect the unexplained drop in severance may have occurred to justify the overall score drop in N9. When sub-scores are changed between drafts without explanation it gives us no confidence in the integrity of the process.

6.11 Ms Allen's comment on S7 at the end of Appendix I. when referring to DOCs Waikawa Reserve sums up her total lack of understanding of our area, and of the impact of noise in a non-urban setting. Quote *"A route would change the nature of the existing recreational area but not necessarily negatively."* It is not so much an entry point as she believes, but rather one of the ideal DOC campgrounds, beautiful, quiet and remote. We often take groups such as cubs, scouts and school groups there to look for eels and camp. Noise especially at night will ruin this!

6.5: Disagree with the comment/criticism

The Workshop agreed to move on. It is acknowledged that some participants wanted to discuss further, and some considered that too much time had been spent on this criterion.

6.6: Disagree with the comment/criticism

The scores shown reflected the outcome of workshop discussions and was not the score allocated by the technical specialist. The summing of scores (by weight) used the lowest scores for all criteria to represent the most favourable outcome - this approach meant that the western options performed better than they would otherwise. The alternative scores (where present) were used for sensitivity analysis, but no changes in order resulted.

6.7: Disagree with the comment/criticism

The notes on impacts were proposed by the technical specialists as a starting-point, and were adjusted through discussion at the workshop. No changes were proposed to the ranking or scoring for these particular sections (N5 and N9 were recorded as 3/4, indicating the workshop did not reach an agreed position on the criterion for these options overall).

6.8: Agree the comment/criticism is fair but not material to the final MCA results and shortlisted routes chosen

The score for N8 for the criterion Social/community/recreation impacts for N8 is recorded as a 4 in Table 4-5 of the MCA report, and these figures were applied in the weighted analyses. The number has been incorrectly transposed and appears as a typographical error in Table 4-10 but has not affected the analysis.

6.9: Disagree with the comment/criticism

The commentary is correct in that the workshop changed the ranking for severance from the suggested Low/Moderate to Moderate for N9. The background notes in Appendix I are a record of the technical specialist's proposals, and not the workshop outcome.

6.10: Disagree with the comment/criticism

The scores were determined at the workshop, and where the workshop did not resolve a single score (regardless of having reached agreement on the rankings of the components of the criteria), both 'candidate' scores were recorded and applied in the analysis as explained in the report.

6.11: Disagree with the comment/criticism

The S7 score was increased as a result of the workshop process. Please note that specialists' opinions can be tested during the statutory RMA processes.

7) Dwellings and Property Criteria

7.1 We think the 300 m corridor did not follow the NZS 6806:2010 standard. An extract from the Noise Mitigation submission states: *“The NZS 6806:2010 and the NZTA guide require all Protected Premises and Facilities(PPF) to be assessed within 200m from the closest traffic lane. With a carriage way width of 27m and an assessment area of 200m either side of the carriage way a minimum corridor of 427m with the centreline in the centre of the corridor is required to perform a Tier 1 assessment 7.”*

7.2 The 300m corridor with the road to be placed somewhere within that corridor makes it simply impossible to assess the PPF’s and certainly compare the different road options.

8) Tangata Whenua Values Criteria

8.1 They scored their own criteria and could not or would not explain why they gave the different corridors the scores they did. The explanation given was simply “it’s too culturally sensitive”

8.2 Local iwi representatives presented their scores with the proviso to the group that the justification for the scorings was too sensitive to share. Given that for 17 corridors 10 scores of 5 were allocated (and these were later used in part to remove corridor options) members requested further information. NZTA stated that they would ask for further detail and provide feedback in the future, but this did not occur at any meeting we attended.

8.3 In the 2012 scoping report only two 5s were allocated across 25 corridors in this criterion. This would lead to the conclusion that the scoring is rather subjective despite guidelines as to how to apply scores.

8.4 Given that these scores underpin the initial short listing this is a fundamental flaw in the process.

8.5 We had asked for another look at Tangata Whenua Value scores on some improved western corridors suggested by locals, as it is hard to believe that the same cultural value can be placed everywhere, and the map 20 combined constraints suggests that using the corridors we proposed would improve the scores. We understand how archeologically the whole area that was not forested has significant issues, but cultural value to people today is not the same as archeological value. And we know in that huge area between Levin and the sea, that some areas must be less culturally significant than others. Very frustrating.

8.6 At the end of appendix G, Tangata Whenua Values Workshop Background Notes the author comments, that a specialist or expert in Maori land Law is required to undertake work to further analyze the corridors, and also, that further engagement with Ngati Raukawa is needed. Does that mean that these things were not even done? Reading the comments

7.1: Disagree with the comment/criticism

The 300m wide corridor is not related to noise but instead provides engineering design flexibility.

7.2: Agree the comment/criticism is fair but not material to the final MCA results and shortlisted routes chosen.

Identification and assessment of effects on PPFs will occur at the next phase of investigation, once a preferred corridor is identified.

8.1: Disagree with the comment/criticism

The cultural significance of the area and the scores for each option was well explained by iwi representatives from Ngati Ruakawa and Muaupoko.

8.2: Disagree with the comment/criticism

The cultural significance of the area and the scores for each option was well explained by iwi representatives from Ngati Ruakawa and Muaupoko. A ‘Tangata Whenua values workshop - background note’ was published as Appendix G to the MCA report.

8.3: Agree the comment/criticism is fair but not material to the final MCA results and shortlisted routes chosen.

As part of the approach taken in 2017 iwi represented themselves at the MCA workshop. Prior to this it was undertaken by Maori advisors.

8.4: Disagree with the comment/criticism

This comment is incorrect. The shortlist was based on an evaluation of all 12 criteria.

8.5: Disagree with the comment/criticism

Iwi explained that there are sections which had less significance but were considering the options as a whole when allocating scores.

8.6: Agree the comment/criticism is fair but not material to the final MCA results and shortlisted routes chosen.

This reference is referring to further discussions/investigation which are continuing with iwi. This is not specific to east or west assessment and does not relate to the MCA scores allocated.

gives us no confidence that any of the western corridors were considered seriously. Rather it suggests that they have been ruled out before they were even really explored.

9) Productive Land Criteria

9.1 In Appendix P The notes for the Productive Land Criteria, it says: *“There is a strong argument that once a property becomes a lifestyle property then the productive capability of the land is lost. When lifestyle blocks, ie blocks of less than 10 ha in size, are removed from the analysis there is generally a significant impact on the scoring of the criteria for productive land for some of the options. Where the area of lifestyle blocks is greater, then the impact on productive land within the corridor is generally reduced.”* This logic was applied to the scoring system. However in the Horowhenua it is significantly flawed as we have so many market Gardeners and small businesses that are very productive and yet operate on land parcels smaller than 10 Ha.

10) Landscape and visual criteria

10.1 Camping at the DOC Waikawa reserve will be very adversely affected by S7, and this is not reflected in the score as it is being treated as a picnic area only and so only direct impacts are being considered. See my comments about night noise earlier and point 3.28 in Appendix D Landscape and Visual Workshop Background Notes.

10.2 Kimberley Reserve has been neglected when compared to the lakes. Kimberley reserve has national scenic status and as it is so large it also has a very popular freedom camping area. Overnight camping will be adversely affected by N9. **The reserve is not even mentioned in the analysis of N9**, and yet N9 goes over the bottom end of the reserve. See my other comment on its absence from the landscape constraints maps, and points 2.30 to 2.33 in appendix D.

10.3 The lakes were giving automatic scores of 5 whereas N9 scored a 1. We argued this in the workshop, pointing out that if N2 was placed as far right as possible, then the ridge would actually make a natural barrier anyway, so there would be no noise or visual impact on Lake Papaitonga, even though N2 was close. Whereas N9 noise will most likely bounce off river terraces and move directly upstream (straight line) to have a negative impact in the camping area etc in Kimberley reserve. It seems very unfair!

10.4 Workshop attendees had less than 12 hours to look at a huge document, and so basically couldn't prepare. (Nb I can't think of any other criteria that gave us any background info to pre read before the second workshop, besides constraint maps. So I guess it was better than most). Nb the document we got was not the workshop seen as appendix D to the published MCA, ie it didn't have suggested scores and wasn't collated in a useful form so working out scores from it would have been tricky. Let me know if you would like this document sent to you.

9.1: Disagree with the comment/criticism

The evaluation undertaken in Appendix P was not used in the MCA analysis. It was undertaken after the workshop and included in the MCA report for information only, as there had been some concern expressed at the workshop that the productive land scores, particularly for the eastern options, had allocated scores that were too negative, given that some of the more productive land in the corridors was already earmarked for development or was fragmented into small lot sizes. The basis for the analysis (ie the applicable lot size) relied on the experience of the technical specialist involved.

10.1: Disagree with the comment/criticism

The landscape and visual criterion considers the likely landscape and visual effects of the options, which includes effects on the physical landscape and the visual and aesthetic effects of a new expressway. Thus the score is not just based on noise effects.

10.2: Disagree with the comment/criticism

The landscape and visual criterion considers the likely landscape and visual effects of the options, which includes effects on the physical landscape and the visual and aesthetic effects of a new expressway. Thus score is not just based on noise effects.

10.3: Disagree with the comment/criticism

The landscape and visual criterion considers the likely landscape and visual effects of the options, which includes effects on the physical landscape and the visual and aesthetic effects of a new expressway. Thus score is not just based on noise effects.

10.4: Agree the comment/criticism is fair but not material to the final MCA results and shortlisted routes chosen.

The document discussed was an explanation of the constraint map, not a specific MCA document. It was not necessary to read the document in order to attend and participate fully in the MCA workshop process.

10.5 I admit we had trouble understanding the scoring during the workshop, and it was probably quite hard for Ms Rimmer as Mr Lister was away and to us some of the explanations seemed so silly as they appeared to focus on how the lines looked on a map, ie birds eye view, and didn't seem to consider contours and what would or wouldn't be visible from the ground.

10.6 We cannot recall the scores being changed much by the group during the MCA , we never wrote about the score changes afterwards, and the scores that we see published later (ie we only see all these criteria workshops now it's all over) in the Landscape background notes are scores that we would have preferred. However, the workshop was credited with changing the scores from the specialists preferred scores. (see workshop notes) I can't remember anyone pushing for them. From the community's point of view 3 of the 5 changes made in the workshop were against what we would think so I don't know what went wrong. I feel as though this part of the MCA also needs redoing. This is because these score changes are gamechangers when the corridors are chosen.

10.7 Some score options were discussed at the workshop but never made it into the analysis. For example, in appendix C Workshop 2 notes, S7 "could well be categorized as a "significant amenity landscape"" suggesting a higher score for S7 which should be carried through and tested.

10.8 There was definitely talk at the workshop of looking at a lower score for N1 if it was moved over further away from lake Papiotonga. It does not appear that this was followed up on at all. I can forward an email that I had sent to NZTA with a document attached that raises all these concerns as it gives them feedback on the draft workshop 2 Notes. Please let me know if you would like to see this.

11) District development plan Criteria

11.1 The MCA scores were provided by HDC employees. I would suggest that scrutiny by an independent expert may have scored differently. The HDC employees refused to score any 5's despite the presence of corridors splitting the Gladstone Greenbelt Residential area, going over the future commercial hub for this area, and severing the best urban expansion area being set aside in the 2040 Draft Growth Strategy. Developers, and the many residents who have built since council first promoted the Greenbelt residential area, feel totally let-down when HDC wont score 5s and yet other specialists are happy to score 5s much more readily.

10.5 Disagree with the comment/criticism

The first workshop included an introduction to the scope of the criterion, and opportunities to discuss aspects of landscape were provided on the bus trip. It is noted that the technical material presented by the specialist may not have been understood fully by some of the attendees, but clarification and scoring was discussed during the workshop. Also noted that this topic has also been discussed at a subsequent PRG meeting.

10.6 Disagree with the comment/criticism

It is noted that the technical material presented by the specialist may not have been understood fully by some of the attendees, but clarification and scoring was discussed during the workshop. Also noted that this topic has also been discussed at a subsequent PRG meeting.

10.7 Disagree with the comment/criticism

Scores were discussed and agreed at the workshop.

10.8 Agree the comment/criticism is fair but not material to the final MCA results and shortlisted routes chosen.

Refer to attached comments which were provided to the PRG at the post MCA meeting PRG.

11.1: Disagree with the comment/criticism

This was developed using a planning specialist from Stantec as well as HDC. Given that the district plan is an HDC document, they were relevant to discussing the scoring.

12) Ecology Criteria

12.1 The northern ecology scores seem very debatable as the specialists have suggested themselves. Mr Forbes had not been able to attend the workshop and another specialist had stood in for him.

12.2 For example N3 was given a 2 at the workshop but the specialist Mr Forbes points out that this was based on a misinterpretation during the workshop of the mapped route over the length where N2 overlaps with N7 and it should have been a 3. See page 8 of Appendix E Ecology Workshop Background Notes.

12.3 Also, the way the alternative scores were recorded for Ecology meant they did not all go through to the final reports. The alternative score for N4 did get carried through. However, the alternative score for N1 did not. N1 was actually awarded a 2 or a 4, see Appendix C workshop 2 notes, commentary. As lowest scores were being tested in the final analysis that 2 should have gone through. At the time it seemed as though N2, and N6 were also going to be given alternate scores. See the commentary notes as to what was talked about. But this was not done.

13) Project Objectives Criteria

13.1 The scores chosen only cover the range of 1-3 even though there is a large range in the corridors ability to fit the objective. Again, this is like the property criteria. In the workshop background notes it explains that the corridors which score worst do not get distinguished from the moderately bad corridors, which I feel creates potential flaws.

Other concerns.

14) Scoring biases.

14.1 As mentioned under some of the criteria, the different specialists handled the scoring system differently meaning that the results were skewed. This is a significant flaw or weakness as a couple of small differences are enough to change the final outcome. Eg some bunched the scores in the 3s 4s and 5s. And others bunched the scores in the 1s, 2s and 3s. While the weighting system could be used to correct a bias to high or low scores, it seemed to take a more theoretical approach.

14.2 Also, not giving a wide spread of scores cannot be corrected, ie the ability to identify differences is lost, so lack of spread of scores should only be used when there is little difference in the corridors for a particular criteria.

15) Weighting.

12.1: Disagree with the comment/criticism

Preliminary scoring was developed and agreed by two ecology specialists (both with long-term involvement in the project) and presented by one of those specialists. Some scores were modified as a result of local knowledge from those at the workshop.

12.2: Agree the comment/criticism is fair but not material to the final MCA results and shortlisted routes chosen.

The specialists have made clear why a score needed to be changed in order to be consistent and accurate.

12.3: Disagree with the comment/criticism

While the meeting notes recorded some discussion, the workshop settled on a specific score for ecological values for all but one of the options. Eg - it was agreed that option N1 could not avoid the Papaitonga Reserve.

13.1: Agree the comment/criticism is fair but not material to the final MCA results and shortlisted routes chosen.

The scores reflect the judgement of specialists and are tested during the MCA workshop. All options had some benefits. It is normal for options to score well against project objectives in MCA's.

14.1: Agree the comment/criticism is fair but not material to the final MCA results and shortlisted routes chosen.

Specialists were requested to apply the scoring framework for their indicative scores. If the individual specialist deemed that the full range was not needed for a criterion, they did not apply it. For example, if the range of circumstances did not meet the criteria for a 4 or 5, it was not given. All scoring was discussed at the workshop and there will always be differences in methodologies used by various specialists to derive scores (reflective of the subject matter).

14.2: Agree the comment/criticism is fair but not material to the final MCA results and shortlisted routes chosen.

The scores reflect the preliminary judgement of specialists and are tested during the MCA workshop. It is not considered appropriate to force differences between options.

15.1 The community workshop weighting was not ok. Workshop 2 was scheduled to run from 2pm-10pm with 17 corridors being scored against 12 criteria. An opportunity for 204 discussions. It ended up being very rushed and left community members frustrated and speculating about the quality and robustness of the consultation.

15.2 At the conclusion of the scoring the group was then tasked with weighting the criteria. This really is an exercise in applying community values to the criteria and as such should have been made available to the whole community as part of the engagement. Many community members present were uncomfortable with this responsibility, let alone too tired to think clearly.

15.3 NZTA suggested it be revisited at the next meeting and a small amount of time was devoted to it there. It was never put out to the whole community

16) Process.

16.1 This was apparently the first time a community group had been involved at the MCA stage. The community people were simply interested individuals, many with a vested interest, and with no formal mandate of representation for anyone.

16.2 Although community members were involved and put a lot of time in, the reality was that we attended meetings to be told where NZTA was up to. Minimal notice was taken of opinions and comments from community members particularly around some of the MCA scores provided by outside experts”.

16.3 There was too much on the Agenda for the MCA workshop to discuss and evaluate on the day. And even with the PRG meetings there was not time to get through everything.

16.4 It was suggested at the MCA process that the alternative scores would all be tested to check the integrity of the process. This sounded reasonable. However instead just the lowest scores for everything were chosen for analysis. And individual variations were looked at but not all tested together, so that raises the question of how robust the analysis is?

16.5 The fact that all the Western Corridors have been dropped before the Economic Evaluation Manual and Investment Analysis Framework gets done also raises concerns as to whether the western options were seriously considered, and therefore whether the whole MCA was credible. The current options shortlisted by NZTA go through the strongest residential and commercial growth area in the Horowhenua, whereas to the west, growth is not as strong. Because of this surely at least one western option should have been shortlisted to give a meaningful comparison when the Economic Evaluation Manual and Investment Analysis Framework gets done.

15.1: Disagree with the comment/criticism

The second workshop was scheduled to go from 1pm - 8pm, and ultimately finished at 9:30pm. We understand the second workshop went over time, however this was discussed with the group at the dinner break and decided to continue. We also considered the fact that many people took the day off to attend and that an additional hour rather than a whole day was preferable.

15.2: Disagree with the comment/criticism

The weighting was discussed for over 30mins. The community did not express any concerns at the time of undertaking the weighting. The project team and specialists did not contribute.

15.3: Disagree with the comment/criticism

Weighting was re-visited in depth at a PRG meeting. Two community weighting systems were provided, to consider the sensitivity of the changes. It would not be practicable to involve the whole community in a weighting exercise. Also a range of other weighting systems were also used to ensure robustness of outcome.

16.1: Agree the comment/criticism is fair but not material to the final MCA results and shortlisted routes chosen.

The PRG was advised that NZTA did not usually involve the community, stakeholders and iwi to this extent. They were not there to represent anyone; they were there as community participants.

16.2: Disagree with the comment/criticism

The MCA scores put forward by specialists were modified by the workshop attendees. Workshop attendees discussed and clarified criteria to be used in the assessment, and also added options to the long list that was assessed in Workshop 2.

16.3: Disagree with the comment/criticism

To maintain consistency in attendance and considering many peoples’ personal situations, NZTA attempted to use time appropriately and effectively. It is understood the workshops were busy, however this is not uncommon. PRG meetings have a set agenda which is sent to all attendees, no comments have ever been received in complaint prior to the meetings. Often meetings can vary from the Agenda however in generally they cover off all topics.

16.4: Disagree with the comment/criticism

Where more than one score was recorded at the workshop, the ‘best’ score was used in the analysis, as explained in the report. However, the analysis was also re-run with the other scores as part of a sensitivity analysis for those options that remained when the worst-performing options were eliminated (the different weighting systems themselves also serve as sensitivity analyses). This exercise is written up in the MCA report on page 28 for the southern corridor option sections, and 30 for the northern corridor option analysis.

16.5: Disagree with the comment/criticism

The options were appropriately shortlisted through the MCA process before being subject to traffic modelling and economic analysis. Nevertheless, a western option was brought forward for Traffic Modelling as a comparative assessment. This confirmed that the western option does not perform well from a traffic distribution point of view and therefore is unlikely to do well under an Economic Evaluation. The Investment Analysis Framework is used to evaluate a preferred option and is not an appropriate tool to select a preferred option.

17) Latest Round of Public consultation weaknesses.

17.1 The Feedback form had a few errors such as...

- N4 and N9 were both recorded as 9.5 km when later on it was stated that N4 was shorter.
- SH57 was called SH58
- In negatives for N5 and N9 it should say the equivalent of the last negative bullet point for N4 as it definitely affects property and affects businesses, just in a different position.

17.2 Mileage tables that allowed people to compare western options as well as eastern ones were not included in the pop up shop (they were put on line in the Technical publications). This created a lack of confidence in the transparency of the process.

Appendixed emails.

Email 1

From: Lonnie Dalzell [<mailto:Lonnie.Dalzell@nzta.govt.nz>]
Sent: Tuesday, 22 August 2017 9:34 AM
To: Paul & Pam Robinson <p2robbo@xtra.co.nz>
Subject: RE: constraints maps and stuff about the MCA

Hi Pam,

Sorry but I would prefer to not send the constraint maps out digitally due to their size but also we want to give people a chance to review them and once a digital copy is issue we cannot control it. Today everyone will be issued with a hard copy which we will ask everyone to provide comments on so that any changes can be made, we have done our best to include most things but we have bound to miss things so a local review is important.

We do not have a sound engineer attending today as generally acoustic affects requires more detailed information. However NZTA does have acoustic specialists that I can possibly ask to attend next week if the workshop would like me to. Can we please discuss this today. I realise this is a major issue but is very dependent on the corridor and potentially requires further investigation i.e. traffic modelling, and currently as discussed because of the wide ranging options we cannot provide this detail yet.

I would suggest bringing your list of items and discuss them at the meeting. I would just try to remember at the meeting everyones role is to compare the options, not try an influence one option over another. I realise it has potential impacts on lives of the attendees but, and I know it sounds awful, we need to be able to remove ourselves from that position and consider each part of the process with an open mind.

Also at the start of the meeting I plan on address the recent election campaign information released over the weekend as it has caused a bit of confusion.

I will see you this afternoon.

Cheers

Lonnie Dalzell / Senior Project Manager

17.1: Agree the comment/criticism is fair but not material to the final MCA results and shortlisted routes chosen.

Noted.

17.2: Agree the comment/criticism is fair but not material to the final MCA results and shortlisted routes chosen.

The consultation process was not about eastern versus western options, and instead focused on obtaining information in respect of the shortlisted options. Therefore, information at the Pop-up shop related to the shortlisted options. All background information was available online.

Project Delivery Team
System Design and Delivery

DDI 64 4 894 5247 / M 64 21 453 195

From: Paul & Pam Robinson [<mailto:p2robbo@xtra.co.nz>]

Sent: Monday, 21 August 2017 4:48 p.m.

To: Lonnie Dalzell

Subject: constraints maps and stuff about the MCA

Hi, I'm so sorry, I have been out and this hasn't been sent until now, Hopefully you will still get it.
Pam

Greetings Lonnie,
Thanks for all the MCA workshop stuff you sent out on Saturday.

Would it be possible to please see the updated constraints maps today so we can save time tomorrow. Eg I would like to check all the Ohau river reserves are on there now.

Also I was just wondering if one of the specialists might be a sound engineer as mitigating sound seems to be such a key thing and we don't really know anything about it?

Also thanks for sending the criteria as it helps us to get our heads around it to start with, I understand you need to cut them down and regroup them.
The things our group will want to know are there, in addition to (or clearly seen amongst) all the other good points will be things like...

Sound impact on residents
Impact on economic value of neighbouring properties
How well the landscape can absorb all the impacts
Loss of non renewable resources
Connectivity/severance
Other cultural besides Maori?
Impact on businesses
How well it will tie in with interchanges

Does this help to send this now? I hope so as I was worried I talked too much the other day, and it must be tricky to group them all, and condense them all down.

I spent the 2 days after the meeting getting my head settled on the idea that we really don't know where the road is going to the north , so it is ok to not factor that in...
And then I have to laugh because Simon Bridges hasn't helped has he!

Thanks,
Pam Robinson.

Email 2

From: Paul & Pam Robinson [<mailto:p2robbo@xtra.co.nz>]

Sent: Monday, 28 August 2017 9:08 AM

To: 'Lonnie Dalzell' <Lonnie.Dalzell@nzta.govt.nz>; 'Sylvia.allan@ihug.co.nz' <Sylvia.allan@ihug.co.nz>

Subject: Corridor options for the MCA

Hi Sylvia and Lonnie,
This is the bigger email, that I am finally ready to send...

Corridor options.

I realise that before the consultation period in June, NZTA's preferred corridor options were to the east of Levin and quite a lot of work had gone in to some areas in the east, while in recent times no research had been put into the west. As you know, I have an interest in the eastern side. Therefore, it is very important for me to see that this whole process is genuine including a best effort to find other corridors.

To be able to have confidence in this MCA process we need to feel that the best effort to find corridors through each general region has been made. We need to know that options are not thrown out just because some of the corridors we will assess run through flawed areas that could have actually been avoided.

I can see that the MCA is the best way to assess all the options, as long as it is done really thoroughly and transparently, and is based on correct information. If any eastern corridors were to be short listed then all eastern residents would really need confidence in the integrity of the process.

However, when I looked at the proposed corridors on Tuesday I was very concerned that the western ones had been added hastily, or not revised sensibly in view of developments which have occurred since they were first suggested.

We think you recognised this when you offered to add more corridors, and I trust you have added the extra suggestions that we all discussed at the meeting (although they did not seem to be attached to the email sent on Friday, so we can't check them). However, the more we think about it, our resident's group is very concerned about the corridors chosen, and about how much research has gone in to looking at western options.

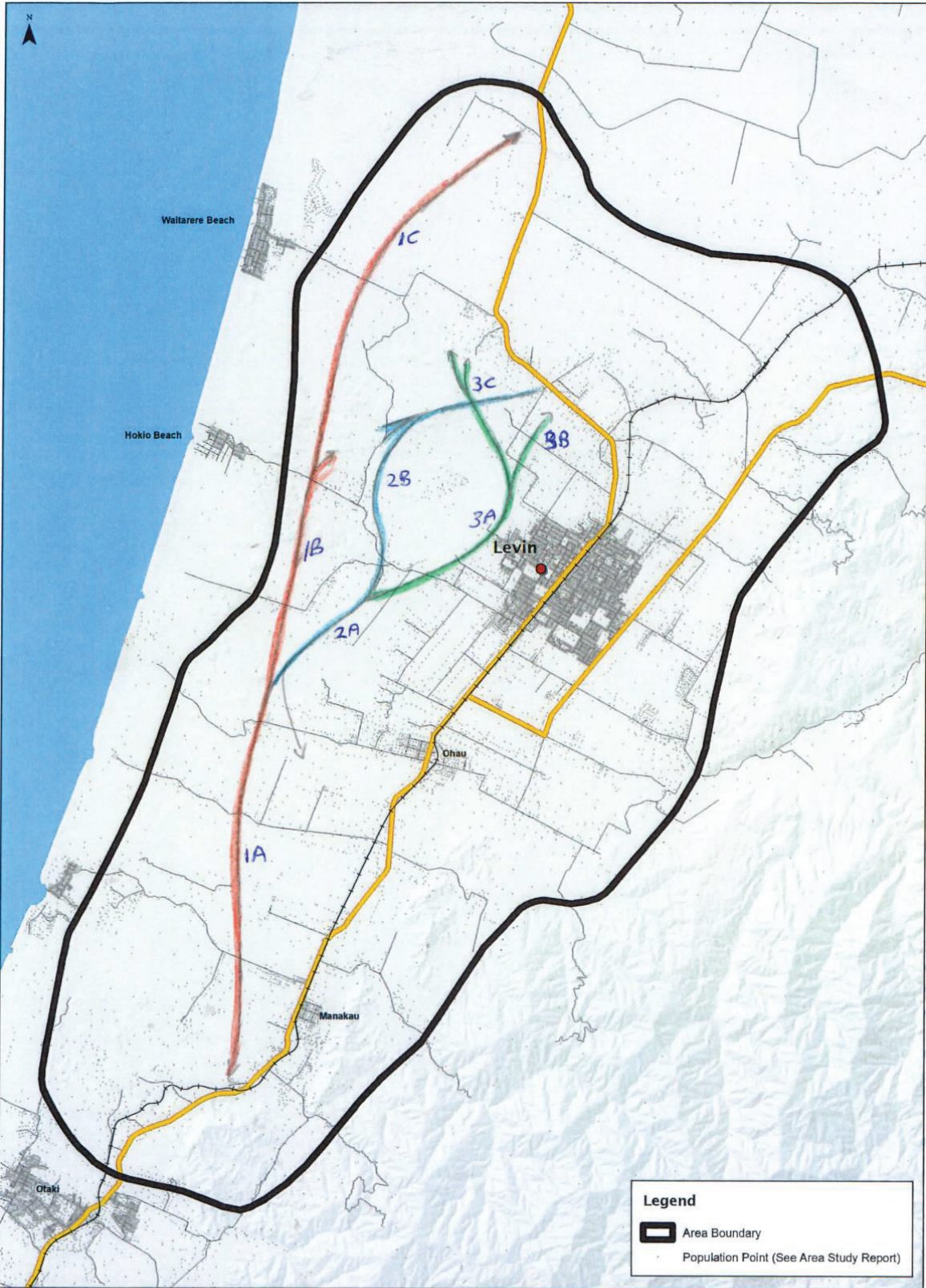
Your engagement report states on page 25 that 75 % of the feedback which stated a preferred option, asked to go west. So, it would be fair to assume that we are not being unreasonable.

This is all about trust, could we please have an extra meeting, even just before Tuesday's one, to explain how the corridors were selected, and to give us some much needed confidence.


Also, some of us have got together and come up with a few alterations or extra corridors that might possibly be worth a quick consideration too. Its just that we need to know the best possible corridors for each region are being assessed. I have attached the map we have made. Its not our job to find the best corridors, but if one of your ones encountered a serious flaw can we just check there is not another way, and this map might give an extra option.

Sorry I have been unable to get this to you sooner.

Thanks so much,
Pam Robinson



Legend

-  Area Boundary
-  Population Point (See Area Study Report)



OTAKI-LEVIN EXPRESSWAY
Map 8. Population Distribution



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INTRODUCTION

I consider the both the 'Background Report to the Community MCA workshop' and the 2011 'Baseline Report' are thorough and robust. Those reports address and explain many of the queries raised.

RESPONSE TO NOTES ON EMAIL

We consider the landscape in a 3D manner (not a plan view) the same as the correspondent.

We acknowledge that any highway will have substantial adverse effects, including adverse visual effects and potential severance effects within communities. The purpose of the assessments is to find the route that minimises such adverse effects (the 'least worst' route). This is explained at paragraphs 1.6-1.8 of the Landscape and Visual Background Report.

We took into account potential impacts on physical communities or groupings of houses. This is explained in the Baseline Report. It is why we mention effects on houses as part of the 'landscape and visual' criterion notwithstanding the arithmetic counting of affected houses in the 'property degree of difficulty' criterion.

We scored the option that would most affect the Gladstone area a '4' which took into account (amongst other things) effects on the groupings of houses in that area. By comparison, we scored other routes that avoid Gladstone (N4, N5, N9) as '1', '3' and '1' respectively (acknowledging that any option will nevertheless have adverse effects).

RESPONSE TO COMMENTS ON MINUTES OF COMMUNITY MCA WORKSHOP:

The following responses are to the extent they affect the 'landscape and visual' criterion.

Corridors (fine-tuning to avoid specific features or critical flaws) – page 2 first and second highlight

We proceeded on the basis that the route is 300m wide and the actual alignment would be fine-tuned to avoid or reduce adverse effects. In other words, the scores were not determined by specific features that one would reasonably assume to be avoided. This is explained at paragraph 1.9 of the Background Report.

Specifically, we assumed routes would be fine-tuned to minimise effects on Papaitonga – for instance paragraph 2.10 mentions the need for that alignment to be shifted east. And while we noted that some options were 'close to fatal flaws', we did not rank any routes as such in the landscape background report.

Tangata whenua – page 6 first and second highlight

We took tangata whenua associations with specific landscape areas into account as part of the 'landscape and visual' criterion, on the basis of documentary evidence and not influenced by ownership. Our scoring is impartial of ownership. But it contributes to a 'landscape' score of '5' for routes N1, N2.

We did look to opportunities to fine-tune routes or corridors as discussed above. We scored N6 a '2' and noted that it is the only one of the western options that would be reasonably consentable in terms of 'landscape and visual' criterion.

Landscape/Visual Impact

Aerial view vs view from the ground, Page 9, first highlight.

The landscape was not assessed as an 'aerial view'. It was assessed from the ground following numerous site visits from 2011 onwards (including prior to the community MCA workshop to check any recent changes), on documentary research into the landscape history, and on GIS. This is described in the Baseline Report.

Fitting with landscape patterns is relevant to physical disruption/severance and how the road is experienced visually at ground level. For instance, following the toe of the hills means the highway will be visually anchored by the hill backdrop and will not bisect the plains. Similarly a highway square to the cadastral pattern at the rear boundaries of properties will cause less visual and physical disruption. Fitting with landscape patterns is not to do with a 'helicopter eye view'. In terms of the examples listed:

- The manner in which S4 criss-crosses the plains would be visually intrusive as experienced on the ground – not as a 'helicopter eye view'.
- N1 scored '5' for a number of reasons as described in the Background Report. As discussed above, we based scores on the assumption that the alignments would be fine-tuned within routes so as to avoid or minimise adverse effects on specific features. N6 is in fact a shifting of the N1 corridor and we scored it a '2'.
- We assumed the N2 route would be moved east to avoid cutting through the bush at the eastern end of Papaitonga as noted in paragraph 2.10 of the Background Report. Paragraph 2.11 goes on to say that, even with this change, N2 scores poorly for a number of other reasons mainly (but not entirely) relating to the area around Lake Horowhenua.
- Kimberley Reserve is discussed in the Baseline Report, identified on Figure 2 in that Report, and taken into account in the scoring of N8 and N9 (including reference to the ability to mitigate effects by aligning the route with where the transmission line crosses).

Valley behind Manakau, page 10, first highlight

It appears this refers to the valley followed by S7 (Waikawa and Waiauti Streams). **I do not consider it is a special amenity landscape.** The Baseline Report describes it as having *"...a pleasant rural character without being particularly noteworthy. The transmission line detracts from visual amenity. The exception is the area at the north end in the vicinity of Kimbolton Reserve which has high levels of amenity and recreational use."*

ADDITIONAL COMMENTS

Aspects of landscape

- Aspects of landscape considered in the assessment (biophysical, perceptual and associative factors) are set out in the baseline report and the workshop report (pg 5 both documents).
- The term 'fit with the landscape' is a useful shorthand for comparing effects on these factors; as they 'show up'/can be seen in the natural, built and heritage patterns in the landscape.
- When an alignment follows those patterns e.g. requires less earthworks (follows the landform) or follows cadastral lines (built patterns) it is less likely to impact on biophysical, perceptual and associative matters; to have less effects on the natural, built and heritage environment.
- While the option alignments were presented in plan view (birds eye) at the workshop, the landscape assessment combines site work over 5 years, analysis of 3D GIS data and an understanding of the proposal components as they would be experienced from the highway and from nearby areas.

RMA guidance and cultural values

- Our work and assessment of effects also needs to be guided by the RMA.
- Section 6 matters, include outstanding natural landscapes as well as recognised ecological values, values to tangata whenua and notable heritage values (such as the Prouse homestead). These factors require consideration as a matter of national importance.
- Rural residential landscapes such as those that might be impacted by alignment N5, with heritage values built up over several generations, are considered under Section 7 of the RMA; as other matters to have particular regard. Section 6 and Section 7 matters are underpinned/distinguished by other statutes and the Treaty.
- In practical terms this means that alignments which avoid areas of value to local iwi, indigenous vegetation and the Prouse house and its surrounds need to be considered as better/ viable alternatives in terms of landscape.
- This does not mean there will not be significant effects resulting from other alignments, or that the areas impacted are without landscape/heritage value. However, the RMA requires that effects on matters of national importance are avoided as a first priority.
- For example, even though N4 and N5 were both scored a 2 at the workshop, this is the reason why the alignment N5 is distinguished from N4; because it provides a wider separation from the Prouse house than N4.
- All of the options will have significant effects on property, current patterns of landuse and amenity values and these were assessed in separate criteria.

Gavin Lister, Lisa Rimmer
20 September 2017



APPENDIX C

Additional Letter regarding Productive
Land Uses and NZTA Response

O2NL - MCA Review

NZTA is undertaking a review of the Multi Criteria Analysis (MCA) Process for the O2NL Expressway.

The MCA results were used as the basis for selecting preferred routes for public consultation.

Questions have been raised about whether the MCA process was robust and hence the route selection process appropriate.

Tararua Growers Association is concerned about how the MCA process was undertaken, in particular how production land was taken into account and reflected in the values ascribed.

The reasons for this concern are:

1. The removal of sites of 10ha or less from the MCA Assessment.
2. The MCA did not take into account economic productive value, employment or effect on businesses that are dependent on the use of soil
3. The Productive soils report does not consider the rotation, leasing and sharing of land
4. The Productive soils report only looks at soil and not other components required for a production system
5. The MCA for productive soil was discounted because 'of the small area affected'.
6. The MCA does not give sufficient weight to the District Plan provisions to protect productive soils.
7. NZTA has used a Project Reference Group (PRG) as a key part of undertaking the MCA. There was no grower representative on the PRG and it appears that they did not have adequate information about the effects on commercial vegetable growing on which to base their decisions.
8. The appropriateness of the MCA process for route selection

Tararua Growers Association engaged The AgriBusiness Group to undertake a survey of growers affected by the O2NL routes to assess the likely impact on the commercial growing businesses.

The results of the survey confirm the concerns about the MCA Review.

Background to commercial vegetable growing in Horowhenua

A number of components are needed for successful commercial vegetable production, including suitable land, soil, climate, availability of water, and access to transport and staff. Horowhenua provides a range of these attributes and so is a core commercial vegetable growing hub supplying both local, national and export markets.

The growers in Horowhenua range from small family businesses to large scale operations. Some focus on a small number of crops, eg broccoli, potatoes and onions, while others grow a wider range of crops, often to supply the farmer markets.

Growing is undertaken on blocks which can be owned or leased by the grower. It is important to have a rotational system and so crops are circulated around various blocks. Therefore lease land is an important component of the system. Of the area in the survey 66% of the land grown on was leased, with 34% owned. This means that land may not appear to be used for commercial vegetable production at one point in time but it is not precluded from such use through a rotational leasing system.

Comments from Tararua Growers on the MCA process

1. Explanation/Background to Commercial Vegetable Growing in Horowhenua

This information is a confirmation of what we understood, including the following characteristics:

- Mix of owned and leased blocks
- Mix of family (often long-established) and large commercial businesses
- Rotation and fallowing is typical
- Use of small blocks for specialist crops
- Employment is important
- Vertical integration (ie post-harvest stages are also part of the local economy and may be on-site or other local location)

The significance of the production to the local economy is also recognised.

We did have at least one local grower involved in the MCA process (Geoff Lewis), even though he was not wearing the TGA hat (as far as I am aware).

Growers can grow a crop in small blocks and so small blocks are part of the rotational growing system.

The operations employ staff. The growers surveyed employ 136 staff, at an average of 0.25 staff per ha of production.

In addition growers have a range of post-harvest infrastructure as part of the growing operations. Such facilities include grading and packing and storing of product and distribution centres.

The value of production is significant. The average gross margin/ha of the growers surveyed is \$36,829.

Reasons for concerns about MCA Process

1. The removal of sites under 10ha from inclusion as being productive.

The assumption in the Report 'Assessment of productive land values when lifestyle and zoned land is excluded' is that areas of land 10ha or less are lifestyle blocks and so have been removed from the assessment for productive land values.

The report (Pg 1) states that removing such blocks had a 'significant impact on the scoring of the criteria for productive land for some of the options.'

The survey undertaken for Tararua Growers asked growers to identify the size of the blocks on which they were growing.

A total of included 46 blocks with a total area of 536.3 ha were identified. The average block size was 11.7ha with 66% leased and 34% owned.

28 blocks were 10ha or less. 14 blocks were under 5ha.

Of the blocks 10ha or less 61% were owned by the grower and 39% leased.

Of the blocks 5ha or under 57% were owned and 43% leased.

Of the total survey area (536.4ha), 142ha (or 27%) are blocks 10ha or less.

Therefore commercial vegetable production is being undertaken on areas 10ha or less and these should be retained in the consideration of the impact on productive land. Being less than 10ha does not make them unproductive or unsuitable for commercial vegetable production.

The following table sets out the effect of taking out properties 10ha and less from the calculations for the preferred routes based on Appendix H and attachment to Appendix P.

Reduction in areas when applied

	Original report	Amended report	Difference (ha)
S6	509.8	230ha	279
S7	552.5	315ha	237
S7A	Not inc	290ha	Not inc
N4	273.6	40ha	233

2. Removal of land less than 10 ha from the analysis

The analysis and scoring of productive land values for the MCA included all land, regardless of property/lot size or actual use of land. This is seen in Appendix H to the MCA report. The information in Appendix P did not form part of the MCA. This work undertaken by the specialist firm, LandVision at NZTA's request and in response to concerns expressed during the MCA workshop that the scoring of some options may have been unrealistically adverse and that scores should be checked when land that was zoned for non-rural uses and land in small blocks was taken out of the analysis. The decision to use the 10ha minimum size was that of the specialist, not NZTA. While Appendix P does include a commentary on the extent to which this might have affected the MCA, that was post the MCA itself and did not influence the MCA analysis or outcomes.

The revised figure were used in the information compiled for the consultation and shown on the information sheets. In our meetings with affected landowners we did identify the productive uses to which land was being put, and this together will all information collected will inform decision making on a preferred option.

N5	293.5	95ha	198
N9	353.0	130ha	223
			1170

Given that growers are growing on blocks less than 10ha the reduction in area is significant and does not adequately take into account land that is suitable for commercial vegetable production.

The assumption in Meeting Notes 29 August 2017 relating to productive land values states: “The presence of rural residential subdivision significantly reduces the productive potential of the land”. There is no evidence presented to quantify or justify this statement. Rural residential subdivision does not in itself reduce the productive potential of the land. However it may place constraints on the ability to use the land for productive purposes. No input was sought from growers to contribute to this assessment. As shown above the commercial vegetable production is undertaken on a number of small blocks, including on some near rural residential development. The MCA is therefore questioned as it is based on an inaccurate premise through the removal of properties 10ha or less.

2. The MCA did not take into account productive value, employment or effect on businesses.

Appendix J sets out background for property issues.

Section 3.0 notes effects on market garden holdings (productive land) as a factor to be considered. (Note that the term ‘market garden’ is a redundant term. ‘Commercial vegetable production’ should be used.)

The report then states: “Productive land is a matter considered in isolation in the Multi Criteria Analysis; however it should be noted that the identification of productive land itself does not necessarily provide a full picture of the overall effect on property land use.”

The Tararua Growers agree that identification of productive land does not tell the full story. But nowhere in the reports is there an attempt to ‘tell the full story’. For instance there is no consideration of the effect on employment or value of production, or effect on commercial assets.

3.3 of the Report states that the eastern side of SH57 “contains areas of productive land that have been split into smaller uneconomic lots”. There is no quantification as to what makes a lot ‘uneconomic’ or on what basis the statement is made.

The lot sizes on which growing is undertaken demonstrates that even small lots are regarded as of value and ‘economic’ to growers. Therefore the presumption in Appendix J 3.3 is incorrect.

The Report ‘Assessment of productive land values when lifestyle and zoned land is excluded’ equates the potential amount of land lost to ‘less than the area of half an economic dairy farm’. This is inappropriate comparison for Horowhenua when significant areas are in horticulture production that has greater returns per ha than dairy farming. Even a small area is of value to horticulture.

3. Property Issues

The commentary is critical of specific comments in the meeting notes and both the Effects on Property and Productive Land background reports (Appendices H and J).

The MCA process is being used to undertake a broad route options analysis to identify scale of effect/ degree of difficulty. The detailed effects on individual productive units are addressed through the next phases of design and through the property acquisition process. Where such issues were raised in the individual meetings, generally landowners appeared to be open-minded about future options and understood that, while land would need to be taken, it would be considerably less than the 300m wide corridor and there would be opportunities for providing access and re-parcelling of surplus land, (depending on site size, location, circumstances, etc.), etc.

The survey of growers shows that the average gross margin for the growers is \$36,829 per hectare and that they employ .25 staff per ha. Therefore 4 hectares represents a full time employee in horticulture in Horowhenua. These factors are an important component of the value of productive land in Horowhenua but have not been taken into account in any of the reports on which the MCA was based.

3. The Productive soil report does not consider rotation and the leasing/ sharing of land

None of the reports produced for the MCA Process take into account the nature of the use of productive land in the Horowhenua District. Of particular importance is the leasing and sharing of land for sustainable management. Just because an area may not appear to be used for horticultural purposes at a particular point in time, does not mean that the land is not used for that purpose. It could be that the land is part of a 'pasture' stage in the rotation.

Leased land is a key part of the rotation. The survey of growers identified that 66% of the land was leased with 34% owned. Therefore any analysis based on land ownership will not accurately reflect the use of that land.

4. The Productive land report only looks at soil and not other components required for a production system

Appendix H is titled "Productive land values" but is entirely based on LUC classes. While these are important for a production system there are a wider range of factors or values that need to be taken into account to enable the land to be utilised for productive purposes. In terms of horticulture this includes availability of water, access to labour, access to markets, climate and accessibility as part of a rotational system.

None of these factors are taken into account within the LUC classes. Therefore the assessment of productive land values is based on a narrow set of criteria that does not reflect the values for commercial vegetable production.

Horowhenua is identified in 'New Zealand domestic vegetable production: a growing story' Report as a main growing region for vegetables. 22% of NZ's production of broccoli and cauliflower is from the Manawatu Wanganui Region, with the bulk of this being from Horowhenua. (<http://www.hortnz.co.nz/assets/Media-Release-Photos/HortNZ-Report-Final-A4-Single-Pages.pdf>)

The reason for the area being suitable for vegetable production is more than the soil attributes and should be taken into account in an MCA process.

5. The MCA for productive soil was discounted because 'of the small area affected'

The MCA weighting of criteria gave an 80% weight to productive land value because "While the loss of productive was recognised as very important to the community, the small extent of land involved reduced the weighting given to this criteria." (Notes 29 August 2017). It is noted that property degree of difficulty was given 90% weighting because of severance issues for farmers, but no recognition of the effects on commercial vegetable production in the district.

There are limited areas in New Zealand that provide all the components needed for a commercial vegetable production system. Therefore areas that are suitable are important and

4. Rotation and leasing/sharing of land

As noted above, this has been recognised throughout the project development. For example, short-rotation cropland was one of the categories used in the land resource assessment of options (using 2008 LUC information) in 2015.

5. Other components of the Productive System

As with the item above, this is recognised, but the needs and methods are very diverse, depending on the scale and type production, ownership and management, etc, and may change considerably over time (eg, seasonal employment). It is not necessary to handle this information within the framework of an MCA, which is a broad option evaluation tool. The issues and matters raised can be identified through the land owner consultation process and will thus influence decision making at that point if necessary. The site specific consideration will be relevant to the next stages of preferred option design and then property negotiations on a case-by-case basis.

6. Weighting Systems

The comments are critical of the 80% weighting applied to the productive land criterion. This was the Workshop weighting and was the highest weighting awarded. At the following PRG meeting 2 additional weighting systems were introduced which allocated a 90% weighting to this criterion, which is also reported in the MCA report.

As one of 12 criteria that was tested out under a number of weighting systems, it is incorrect to say that productive land has been "inappropriately discounted".

removal of any part of these has an impact on the system. While the area potentially affected by the O2NL routes appear to be a 'small area' proportionately the areas are significant to growers. For instance: if a grower loses 50% of their land to the road then it is a significant area and makes the business unviable.

The recent Report by MfE on land lost from production highlights the issue that even losing small areas compounds at a broader scale.

Appendix H Productive land values report notes (Pg 4) that "Elite soils are finite, and in our lifetime, they are no longer being made (or at least for productive use.) This is the reason for some level of protection."

Given this statement the value ascribed to a finite resource should be higher, not discounted as applied in the MCA process.

Therefore the 80% weighting inappropriately discounts the assessment on the value of productive land.

6. The MCA does not give sufficient weight to the District Plan provisions to protect productive soils.

The District Plan has a strong policy framework to protect productive soils, with the ability to subdivide limited for that reason. The limitations to subdivide areas of Class 1-3 land are a contributing factor as to why these areas are relatively free from lifestyle development, making it more attractive for a potential roading route.

The district plan provisions were considered under Appendix K District Development.

However the assessment does not take into account the District Plan provisions for S7 or S8 stating that the impacts are 'Rural Zone land only – land based productive effects covered elsewhere'. However the effects of the zoning are not adequately addressed in the Productive soils report as the focus is only on the soil class.

If the District Plan is so directive that these soils be retained this should have been identified as a constraint in the assessment. Therefore the MCA analysis is deficient in this regard.

The assessments for S6, N4, N5 and N9 do not mention productive soils so it is unclear if the District Plan provisions relating to soils are taken into account for these areas.

7. Project Reference Group (PRG)

NZTA used a Project Reference Group (PRG) as a key part of undertaking the MCA. There was no grower representative on the PRG and it appears that they did not have adequate information about the effects on commercial vegetable growing on which to base their decisions.

It is surprising that in identifying potential members for the PRG they overlooked a key business area in Horowhenua which was likely to be affected by the project.

7. District Plan Provisions

The District Plan provisions relating to productive soils are in the form of an overlay and thus was factored in to the assessment.

The Class 1-3 soils constraint is recognised and that is why effects on Productive land is a criterion in the MCA.

8. Project Reference Group

It is true that there is no TGA representative on the PRG. NZTA did its best to identify organisations through wide consultation, including with the Council and sought clarification from the PRG as to whether there was a party/stakeholder missing. Some new ones were identified but this did not include the TGA. See earlier comment that at least one PRG is a grower in the area. The TGA have now been invited to attend the next PRG.

8. Appropriateness of an MCA Process

The MCA process is an adequate tool if what is sought is an initial quick review of what is possible, basically to weed out what is not possible.

Then a more detailed process should then be used to select the preferred option.

But in the O2NL process the MCA was used to both weed out what was not feasible and also select the preferred option.

If MCA is used to select the preferred option then the following must be adhered to:

- All the possible selection criteria are selected, appropriately defined and ranked in terms of importance.
- All the people that are involved in the ranking system are trained in carrying it out appropriately.
- The selection criteria (ranking numbers) are sufficiently wide enough to allow for the subtle differences between options.
- The final weighting of the options is done with the full knowledge of the people doing the ranking and it is very well explained to them.

Given the description of the MCA process in the background papers it would seem as though, in respect of the O2NL process, not all these criteria have been met, in particular the ability to identify subtle differences between options and adequate training of those carrying out the rankings.

9. Preferred Option Choice

The MCA has contributed to the short-listing process and was complemented by other assessments. Ultimately the decision as to preferred option is the NZTA Board's to make and that this decision will be informed by the MCA, as well as other information collected (including from consultation) and technical assessments.



APPENDIX D

MCA PowerPoint Presentation

MULTI-CRITERIA ANALYSIS (MCA)

AN AID TO DECISION-MAKING

MCA Background

Used when important aspects cannot be turned into \$ values (such as heritage, cultural, ecological values, or range of risks).

An advancement on earlier techniques such as cost-benefit analysis, goals achievement matrix, planning balance-sheet.

First developed and tested on transport projects in Hong Kong in the 1970s. Demonstrated that any group of people, given the same information and the opportunity to discuss it, will reach similar conclusions.

Definition of Multi-Criteria Analysis (MCA)

“An analysis technique that takes into account a range of criteria which are both qualitative and quantitative in nature and which reflect the social, cultural, economic and environmental characteristics of the project outcomes.”

“MCA provides a open and traceable method of weighing up the advantages and disadvantages of different options taking account of both tangible and intangible issues.”

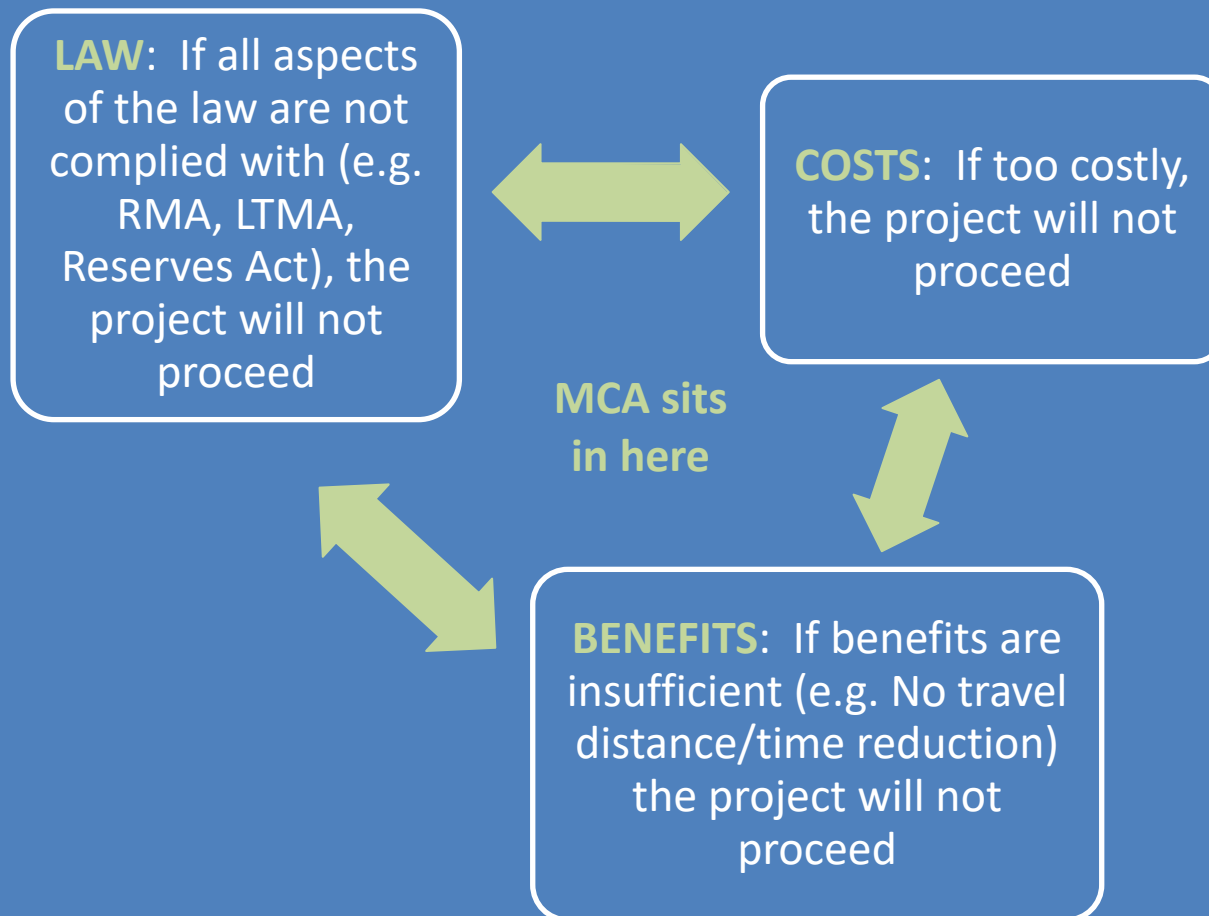
The MCA Methodology

The Multi-criteria Analysis (MCA) Methodology is now widely used.

It relies on adequate information (depending on the level of detail of the project at the time), and on systematic analysis and “testing” of that information.

It involves scoring different options against a number of criteria which reflect the issues that need to be considered (recognising that there may be constraints on what can be done).

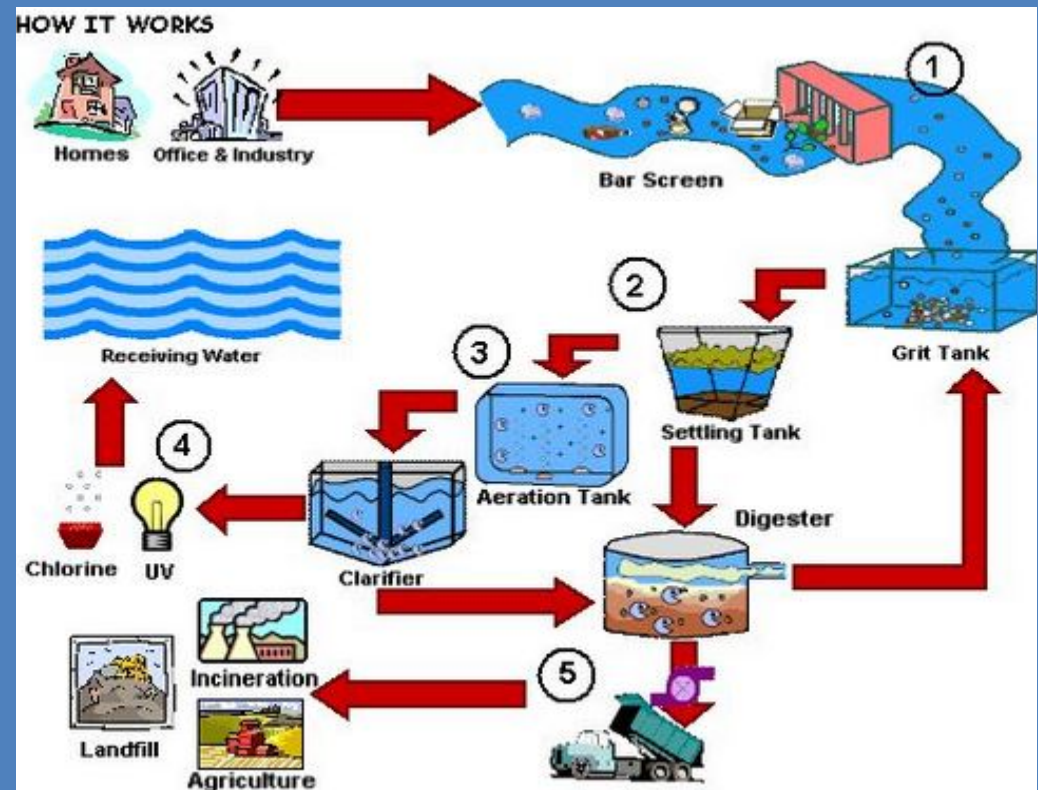
Constraints (NZ Transport Agency “bottom lines”)



Examples of where MCA is used

Local authority projects, for example, in wastewater treatment projects with many variables:

- type
- capacity
- location
- life/duration.



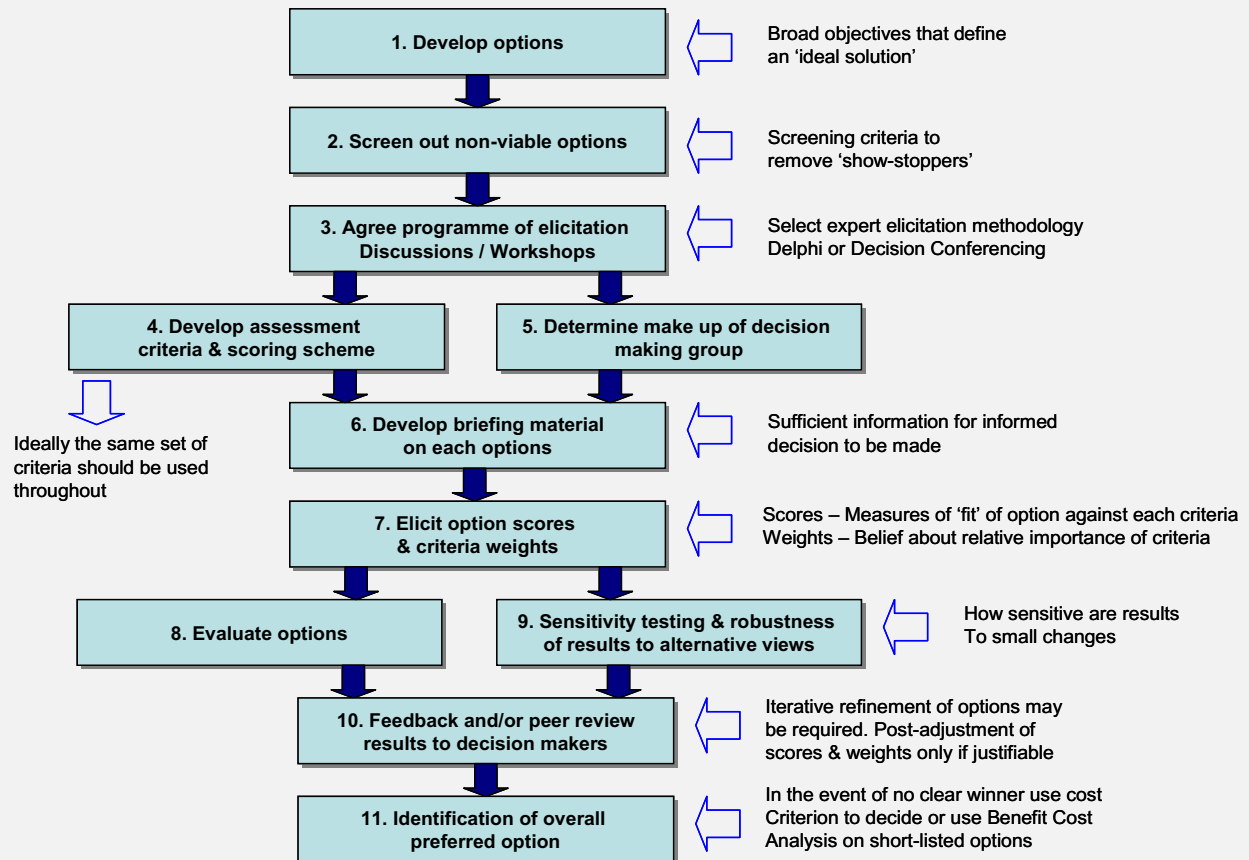
Examples of where MCA is used (cont)....

Network utility projects, for example, planning transmission lines and roading projects:

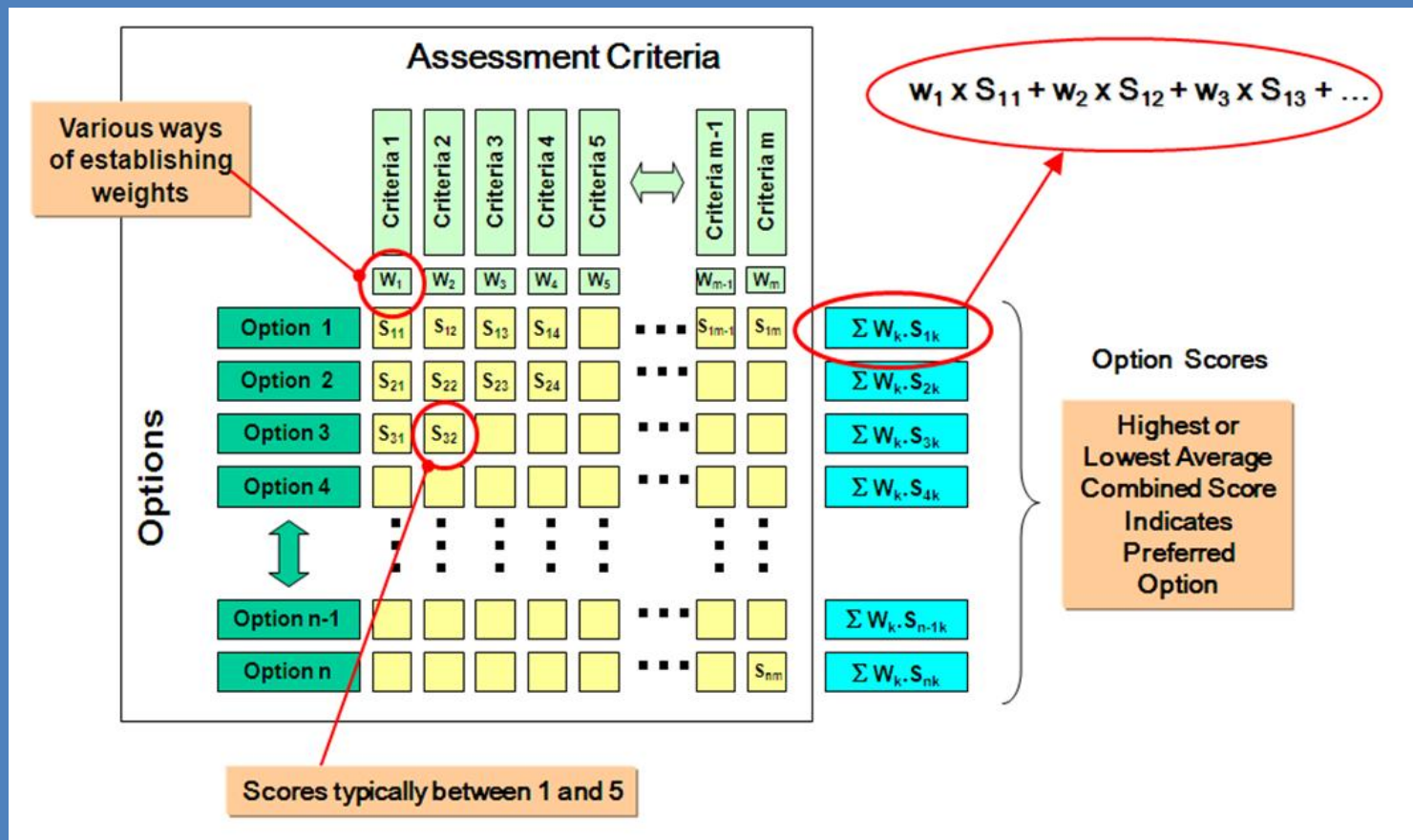
- route location
- interconnections/
substations
- interconnections/
interchanges.



The MCA Process



MCA – Scoring and Weighting



Scores and Weights – What do they represent?

Scores represent how favourable an option is considered to be as regards to a particular criteria. This is done first.

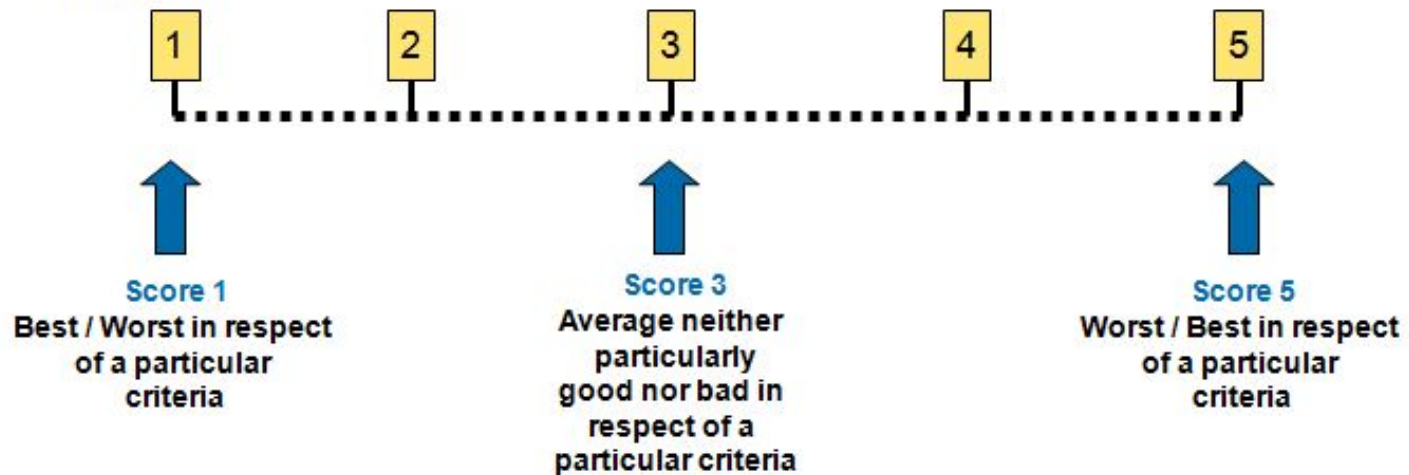
They avoid the need to define a common scale of measurement (e.g. cost) across a diverse set of criteria, some which may be difficult to quantify.

Typically scores between 1 and 5 are used, where 5 represents the “worst” score and 1 the “best” score.

Scoring Scheme

Criteria must be written down, so it is clear to all just what is encompassed by a criterion.

The assigned scores become the “base data” for the analysis.



Scores and Weights – What do they represent?

(cont).....

Weights represent beliefs about how important a particular criteria is compared to other criteria. This is done after the scoring is complete.

If all criteria are considered to be equally important then all weights are the same.

Different people may have different views about the relative importance of criteria.

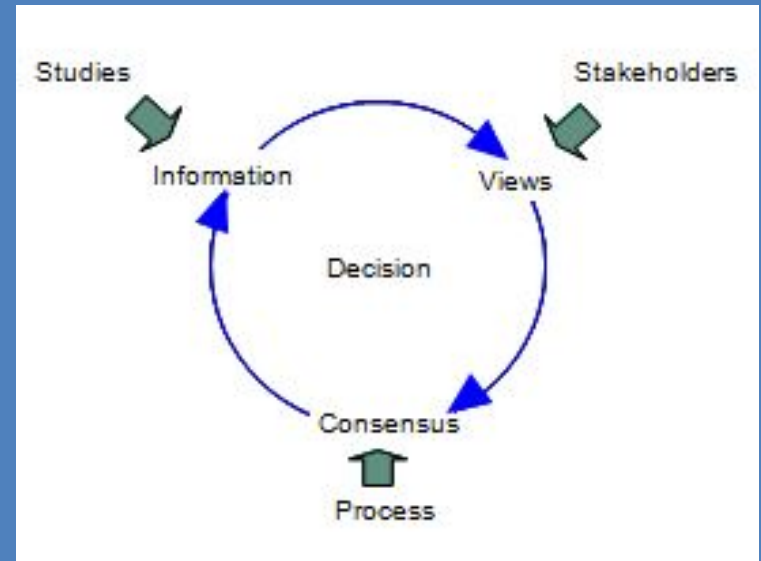
A range of different weightings (from different viewpoints) should be applied. This makes the analysis more robust (and provides a form of sensitivity analysis).

Criteria

- Need to be described (i.e. What is the scope/included in each criterion)
- If there are several aspects within one criterion, these may be broken-down and evaluated separately before being combined. This helps understand what was “behind” the score
- Try to avoid double-counting (although some values may occur in several criteria)
- Number of criteria should be between 8 and 12.

Methods

Two generally accepted methods:



Decision Conferencing – workshop process, scoring and weighting through discussion and consensus, but informed by expert views.

Delphi Process – individuals provide scores remotely. These are moderated by the process manager. Not such a robust process.

Making the MCA Analysis Valid

- Inclusion of variety of stakeholders
- Seek alternative views – weighting systems
- Openness and honesty in the expression and capture of beliefs
- Sensitivity analysis (or several weighting systems) to explore robustness of results
- If no clear preference is identified there should be a willingness to probe further, possibly by other means (e.g. Benefit-cost analysis, pair-wise comparisons).

General Guiding Principles

- Willingness to accept a consensus approach
- Participants should be briefed on the process and on all issues on which they are to make judgements
- The criteria should represent a balanced coverage of the range of issues of interest/concern to them and to the wider community
- The criteria should be independent and uniquely defined.



Final thought.....

MCA should be used as a tool to probe the dimensions of a problem and inform decision-making. The process should guide the decision-maker, but not make the decision for them.

