Appendix K: KCDC Submission

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21 August 2012

Ulvi Salayev
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Peka Peka to Ōtaki Expressway
New Zealand Transport Agency
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Dear Ulvi

Re: Peka Peka to Ōtaki Expressway

This letter records the Council's views on the New Zealand Transport Authority's (NZTA) proposals for the Peka Peka to Ōtaki (PP2O) Expressway (the Project) as proposed to date and communicated to the community in July. Detailed comments are attached. Most comments we have already discussed with you and your team.

Given the high level nature of the information provided in the information panels, it is important that NZTA does not construe this feed back as approval of the more detailed design that will be developed as the project progresses.

We look forward to continuing to discuss with you the issues noted below, and to receiving more detail on how NZTA intends to develop its mitigation proposals for the Project.

Yours sincerely,

Dr Gael Ferguson,
Group Manager
Strategy and Partnerships

ENC: Detailed Comments on Peka Peka to Otaki Expressway Project

Attachment: Detailed Comments on Peka Peka to Otaki Expressway Project

1. Nature & structure of the Council's comments

These comments provide Council's feedback on the information presented in the 14 "project information panels" presented by NZTA at the recent community open days in Otaki (16 June) and Te Horo (20 June), and which form the basis of the NZTA's recent consultation. The panels give a high level indication of the mitigation proposed at key points along the alignment for urban design, landscape, visual, ecological, cultural and heritage outcomes. High level information is also provided on the mitigation proposed for noise and vibration, flooding, freshwater and terrestrial ecology, and stormwater.

The comments below build on our previous feedback to NZTA and are structured as follows.

For each of the information panels we note those aspects that:

a) Are supported, subject to further consultation on more detailed design;

b) where the Council seeks further clarification/more detail to understand the proposals; and

c) Other comments.

Our comments on information panels relating to noise and vibration, flooding and stormwater, culture and heritage, and landscape and visual are provided at the end of this letter (i.e. after our comments relating to specific points along the route).

We also provide separate comment at the end of this letter on walking and cycling facilities along the proposed alignment.

At this stage it is unclear to us what level of detail will sit in the initial Notice of Requirement application and what is intended later in the process. Therefore the comments may relate to what is intended at a later stage. However from the Council's point of view it will be seeking certainty on what is intended at each stage as early as possible.

2. North Ōtaki information panel

<u>Support</u>

The Council supports retaining the existing County Road, although there may be a need for some traffic management for traffic from the north

<u>Areas where more detail is needed</u>

More explanation/detail will be needed to support the statement that there will be "good architectural design of the North Ōtaki interchange bridges." For example, what is the proposed design of the Waitohu bridge design, including location of piers? What future proofing for access is there around/under the bridge?

The Council would like to see more detailed information on the proposed signage to improve legibility of access into Ōtaki, as well as on proposed lighting.

The information panels do not show what mitigation of earthworks is proposed. More detail is required.

Other comments

The Council also recommends that riparian planting should be of appropriate native species. We also suggest extending riparian planting to cover all embankments for the Waitohu bridge.

A further ecological outcome should be added (to those specified on the information panel) along the lines of 'ensuring that unavoidable adverse effects are mitigated according to international best practice'.

The Council notes that the cultural environment is this area will change significantly, and that existing stories/values relate to landform. The visuals shown in the panel did not acknowledge these changes or how they will be addressed.

3. Rahui Road, Ōtaki information panel

The Council supports the following proposals.

- The proposed Rahui Road Bridge (for vehicles, pedestrians and cycles) over the Expressway and railway as this will maintain connectivity between the east and west of Ōtaki. A mix of tall planting at the base of the embankments is recommended for the Rahui Bridge area.
- Provision of pedestrian and cycle links where the local road crosses over the Expressway
- The new pedestrian link between Ōtaki Railway Station and Pare-o-Matangi Reserve, under the proposed Rahui Road Bridge
- Modification of the Rahui Bridge approach on the eastern side to reduce visual impacts on the old dairy factory, improve gradients, etc.
- Retention and planting of native screening plants on the existing railway bund in order to screen views of County Road.
- Rotation of the Ōtaki Railway Station building, although this will need to be done sensitively to ensure integrity of culture and heritage values, as well as landscape and visual values.
- The significant planting shown in and around the structures and embankments.

Clarification needed

We would like to see more detail on the proposed architectural design of Rahui Road Bridge.

We note that any adverse effects on the Mangapouri Stream will need to be offset according to best practice.

How will stormwater be managed? Stormwater and wetland areas appear to coincide on the information panel. The Council reiterates that stormwater ponds are for stormwater; they are not wetlands. (See further comment on this below in the stormwater section.)

No walking/cycling facilities are shown. How does NZTA intend to provide these in the Rahui Road area?

Specific comments on Pare-o-Matangi Reserve

As noted in our previous submission and discussions, the proposed expressway will cut across Pare-o-Matangi Reserve, a place which has been the focus of immense community effort by Keep Ōtaki Beautiful over a number of years.

There are two separate issues regarding mitigation for impacts on Pare-o-Matangi Reserve. Firstly, the concept of 'like-for-like' replacement of the land and values, which requires NZTA to provide mitigation to offset the adverse effects on Pare-o-Matangi Reserve by the provision of similar land and values elsewhere. The Council understands that NZTA is considering options for including land adjacent to the Reserve. This would help rectify the loss of the Reserve, although resources need to be provided to ensure that the area is developed to a similar quality to the current Reserve.

In addition to providing offset mitigation/replacement, NZTA needs to provide for appropriate landscape treatment for the Reserve, as well as any new offset areas. The Council would like to work with NZTA to relocate some of the mature trees currently on the existing Reserve at the earliest opportunity. The Council also recommends that development of offset land is started as soon as practicable.

4. Ōtaki River information panel

The Council strongly supports the proposed half interchange only south of the river to provide access to Ōtaki from the south. The Council wishes to avoid development pressures that would occur with a full interchange south of the river. The minimal use of bridge piers in the river is also supported.

Other comments

It is important that the access under the expressway bridge is provided to an acceptable standard.

Earthworks should reflect naturalized slopes to avoid reading like engineering bunds and repeating the pattern of rail bunds and quarry tailings.

A further ecological outcome should be added (to those already specified) along the lines of 'ensuring that unavoidable adverse effects are mitigated according to international best practice.'

The Council recommends bolstering amenity planting between the railway and the Expressway. In particular, the northern bank around western end of the lake should have more planting, especially in association with the lake and walkways.

5. South Ōtaki information panel

The Council supports the following proposals for this area.

- Building the Expressway lower between Ōtaki Gorge Road and Old Hautere Road in order to reduce the visual impacts of the road and interchange.
- Providing a new access for vehicles to the southern bank recreation area of the Ōtaki River, off the proposed roundabout.
- Providing for walking and cycling across the South Ōtaki interchange bridge to connect with Ōtaki Gorge Road and a new walking/cycling path along the Old Hautere Road link.
- Significant planting around the interchange and riparian planting to river edge.

Other comments

Careful planning is needed to ensure that the "new" Old Hautere Road link is developed in a manner that recognises and respects the wider existing planned rural context and reduces, rather than increases, development pressures in the area.

Shelter belts should use native species where possible as the long-term results are superior to exotic shelter belts.

Pedestrian and cycle facilities are needed on both sides of local roads, as well as suitable cycle and walking treatments at roundabout junctions.

What is the access to the rest area and what facilities, amenity are NZTA intending to provide?

6. Te Horo information panel

Support

The Council supports retention of local connections between east and west Te Horo through the provision of a link road between Te Horo Beach Road and School Road over the Expressway, railway and existing SH1; although we would like to understand whether the culvert or a bridge is proposed over the Mangaone Stream.

We also support provision for pedestrians and cyclists across the local bridge and new section of local road; although we ask that this be wider on at least one side to provide access for horse riders as well and note that safe waiting areas will need to be provided at the top of the bank before the bridge.

Other comments

A further ecological outcome should be added (to those already specified) along the lines of 'ensuring that unavoidable adverse effects on streams are mitigated according to international best practice.'

Embankments around the local over bridge could be shaped and relaxed alongside the waterway on south side of the western and eastern abutments to reflect local natural slopes dunes, river terraces, etc.

Planting of Totara on the Te Horo straights areas of The Avenue between the railway and the Expressway on the eastern side of Expressway through Te Horo and between the railway and the local road would increase amenity and coherence with the existing stands of Totara. This should be interspersed with the swathes of native tree and shrub planting for screening, biodiversity islands amenity and shelter belts where need has been identified. In addition, further tall planting could be introduced beyond the proposed low growing riparian treatment around the waterways. Tall planting could be introduced at the base of the embankments for the bridges.

7. Mary Crest information panel

Support

The Council supports the following proposals:

- the alignment avoiding dunes and the main bush remnants at Mary Crest;
- minimising landform change through shaping and integrating the earthworks with adjoining landforms (dunes); and
- altering the alignment to reduce cultural impacts.

Clarification needed

The panel does not show how the PP2O Expressway will connect with the MacKays to Peka Peka Expressway to the south. This is an important piece of information and the Council would appreciate more detail on this connection at the earliest opportunity.

We would like to see more detail on the proposed architectural design of the Mary Crest railway overpass bridge.

The information panel does not contain any information on the stream and how impacts on it will be mitigated. We would like to understand how NZTA intends to mitigate impacts on the stream.

Other comments

Shelter belts should use native species where possible as the long-term results are superior to exotic shelter belts

We note that loss of wetland areas will need to be offset by restoration of wetland in the vicinity.

Earthworks in this area show a bund with uniform steep sides that appear as a raised causeway exposing vehicles to the surrounding receiving environment. We note that, while this keeps the earthworks footprint narrow, it fails to provide for amenity.

When considering earthworks, there is an opportunity to enhance the design by providing partial screening of the proposed Expressway; for example, through bunds raised above the expressway level to reduce the visual (and noise) impact of the vehicles in the environment, bunds blending into noise wall across the tunnel. The Council notes that earthworks should not exceed 50 metres of uniformity in slope in any one direction and that the final slopes should reflect the slopes of surrounding natural dunes or river terraces, etc.

There are also opportunities to bolster existing natural heritage and, for example, include swathes of native tree and shrub planting taking cues from the surrounding area (for example, near Mary Crest it would be good to bolster the existing pockets of native vegetation and to interplant eco-sourced plantings into existing vegetation). The Council also recommends that tall planting is used to surround low planting along waterways and in and around structures in order to partially screen and connect them into the landscape.

8. Noise and vibration information panel

Support

The Council strongly supports the use of 'open-graded porous asphalt" (OGPA) at Ōtaki to reduce noise on the surrounding environment.

We also support the intention to provide mitigation of noise and vibration effects at properties immediately adjacent to the Expressway and railway, although the phrase "immediately adjacent" requires clarification and mitigation methods must conform with international best practice.

Clarification needed

Very little information is provided on how NZTA intend to address noise and vibration levels. The Council would like to understand how NZTA intends to manage and mitigate noise and vibration effects of the Project. We would appreciate further information on:

- The noise and vibration levels that NZTA intends to apply to the Expressway;
- How construction noise, vibration and dust effects will be managed;
- How operational noise and vibration effects will be managed; and
- The approach to on-going monitoring of noise, vibration and dust effects.

9. Culture and heritage information panel

We note that NZTA's information panel refers to Mūaupoko as the iwi who has maintained occupation of the area relevant to the Expressway, and that this could be taken to suggest that Mūaupoko are tangata whenua. We assume that NZTA has discussed this with Ngā Hapū o Ōtaki, but suggest that, in the future, information disseminated by NZTA portray Ngāti Raukawa and Ngā Hapū o Ōtaki as occupying tangata whenua, and then acknowledge the previous groups such as Mūaupoko.

The Council also suggests that Ngā Hapū o Ōtaki is approached to complete the Cultural Impact Assessment for the Project. NZTA will also need to ensure that Māori observers (and associated costs) are provided for as part of the Project.

The Council wishes to be considered as a key group (stakeholder) within the Project's accidental discovery process.

Clarification needed

The Council would like to understand the following issues.

- How NZTA is proposing to address Māori land interests.
- What is NZTA's approach to addressing waterways of significance to iwi? For example, the Ōtaki River and the natural spring (Drago's property). Also, how will iwi interests be addressed in relation to issues such as run off from works (during construction and operational phases), repairing of wetlands, diverting waterways(if that is happening), and providing for maintenance of native fish passage?
- How is NZTA intending to provide signage for waahi tapu sites along the route, including those that will remain and those that will removed?
- The information panel notes that the beehive kilns will need to be removed from the former Smisek property. The Council is interested to know what is NZTA intending to do with them.
- This panel discusses the relocation of the Ōtaki Railway Station, however, more discussion of impacts on the park and ride facilities, (including parking/ bus /walk/cycle access) would be helpful.

10. Flooding and stormwater information panels (including comments on groundwater and hydrology)

Support

The Council supports a precautionary approach to flood avoidance, but feels that NZTA should look more carefully at flooding impacts within and beyond the footprint of the proposed Expressway.

General comment on hydrological impacts

The three major potential impacts of the proposed Expressway on hydrology are:

- Additional runoff due to land use changes;
- Loss of storage from the floodplain by the proposed earthworks and drainage; and
- Alteration or restriction of the primary and secondary flow paths.

The impacts of the proposed Expressway need to be assessed with regard to the receiving environments and the project must conform to accepted best practice for stormwater management. In particular, we believe that the project must comply with the Kapiti Coast

District stormwater requirements and accepted best practice. This requires on-site hydraulic neutrality and attenuation to restrict peak discharge to pre construction levels in all events up to the 1%AEP flood to be set as a project standard. The assessment of flood impacts also needs to consider any changes in land use associated with the proposed expressway.

It appears that no assessment on the impact on groundwater as a result of the construction of the proposed expressway has been done to date. This is should commence at the earliest opportunity and is particularly relevant in the southern section of the proposed road.

The current design relies heavily on swales and ponds for attenuation. At this stage little detail has been provided on quantifying the required attenuation and how it will be controlled. The indicative locations of attenuation ponds or swales shown in the information panels (and other plans shown to Council) are within floodplains and are likely to be inundated during floods and therefore will be unavailable to provide attenuation of peak flows.

The Council is of the view that 'over design events' need to be considered to ascertain what the impacts are on secondary flow paths as a result of the construction of the Expressway.

The following specific issues require further consideration.

- If the Expressway is built at a Q100 + CC level then it will push more water north into the Mangapouri catchment as Chrystalls bend does not have any climate change component. The Q100 + CC scenario should be modelled to ensure that the proposed mitigations are adequate.

- Modelling should be undertaken for the Mangaone catchment for the Q100 + CC scenario.

- The hydrology for the larger catchments (Waitohu, Otaki and Mangaone) needs to be evaluated and supported by the Greater Wellington Regional Council.

- The Mangone Stream regularly floods properties along Te Horo Beach Road. It is very important that the new local road that will link either side of the Expressway does not increase the flooding potential and in fact it would be a good opportunity to reduce the flood risk to local residents.

- The area upstream of the existing railway line just north of the Otaki Township is an important flood storage area. The culvert under the railway is a throttle that helps limit flooding downstream. In the proposed expressway design the throttle is moved downstream to a location under the new expressway. This considerably increases the contributing catchment area by incorporating the Te Manuao catchment that previously entered the Mangapouri Stream downstream of the restriction.

- The proposed attenuation area next to Mary crest is separated from the Expressway by the new local road. This raises some questions around the location of the operational designation.

11. Natural environment – freshwater and terrestrial ecology information panel

The following comments are made in addition to our comments above on the ecology under the information panels for specific points along the route.

It is essential that natural wetlands and stormwater catchment areas are not seen as synonymous, and they should not be considered to coincide. Wetlands are self-maintaining and change over time. Stormwater areas are a managed system with the primary purpose of stormwater management.

Generally speaking flood protection measures need to be integrated with best ecological outcomes consistent with international best practice.

For revegetation, there are opportunities to look at the wider ecological context and landscape to determine areas where significant areas of revegetation could best be placed to act as islands or as part of a corridor for terrestrial and avian fauna. Currently there are few significant areas shown on plans and no reference to corridors or islands.

In order for any vegetative/planting mitigation to be meaningful and enhance existing environmental heritage, consideration needs to be given to size/area, type and placement in context with wider landscape. We note that, in some cases, sites where mitigation work would have real benefits may be outside the designation but within area of impact of the proposed expressway and infrastructure corridor. Such areas should therefore be investigated.

Ecological sites should be classified as heritage features consistent with the Kapiti Coast District Plan.

We recommend that ecological offset ratios are derived by using a biodiversity offsets model and that they are consistent with international best practice.

We also note the following points:

- wetlands – native plants used in wetland restoration should be sourced from the Foxton Ecological District;
- fish passage – maintenance of fish passage is very important and must be provide for in relation to flood protection and stormwater works; and
- natural heritage does not appear to have been addressed to date.

12. Landscape information panel

Support

The general landscape approach is supported, subject to the specific comments made here and in other the communications with NZTA as noted at the beginning of this letter.

General comments

It would be helpful if NZTA could explain the hierarchy of principles that will determine the final landscape and visual design of the Project, including how these will be implemented in the light of the practical constraints likely to be encountered in constructing the route.

There Project will result unavoidable but significant loss of rural land, loss of areas of existing waterways, loss of ability to restore them as open channels and loss of access. Also, some of the proposed culverts under the infrastructure corridor are long. There is opportunity to provide for adequate mitigation. However, the information panels do not appear to translate key principles of mitigation into adequately sized areas on the plans, or to show how increased infrastructure will be tied into the landscape without it being dominant, or how the existing landscape will be altered to accommodate the proposed corridor. More detailed work needs to be done in this regard.

More detail on structures would have helpful as part of this early consultation process. The Council notes that structures, including bridges and water crossings, right down to the size and location of piers of bridges, will have impacts. Early design of structure and communication with the Council and other parties will assist with development of adequate construction and operational mitigation.

We note that amenity work outside the designation is needed to strengthen existing landscape and heritage. This requires further investigation and agreements with respective landowners.

13. Cycle and walking facilities

The Council believes that it is very important that walking and cycling facilities are provided in parallel with the Expressway and treated as part of the Project.

It is understood that there is agreement that provision of these facilities would occur at the time of revocation and would be advanced physically alongside the revocation process. However, the revocation process does not normally address such matters. Therefore the project at this stage needs to clearly show the cycling and walking provision as a clear part of the project. The following comments are made on the basis that the project must show these facilities.

There is no evidence of any north south cycling and walking facilities in the information panels or on the large map of the alignment provided to Council by NZTA. In fact it appears that north south cycling and walking facilities have been removed from the plans. In particular, we note that:

- no walking/cycling facilities are described, discussed or drawn, with the exception of Rahui Road and Old Hautere Road;
- SH1 is excluded from the proposed RoNS between Otaki Gorge Road and Te Horo Beach Road, with attendant implications for proposed cycling/walking route;
- no reference is made to a clip on pedestrian facility on the eastern side of the existing SH1 Otaki River Bridge;
- no provision is made for cycling/walking facilities around or over Waitohu Stream and north; and
- no reference is made to safe crossing points of SH 1 when it becomes a local road at Te Horo.

These are all features that have been discussed at previous meetings with NZTA and that Council expected to see reflected in the information panels. A walking/cycling facility is an important component of the project and should be constructed at the time of the Expressway, as part of the project.