



Transmission Gully Project Assessment of Environmental Effects report

Prepared by Beca in association with Incite and SKM

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for the NZ Transport Agency and Porirua City Council



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Table of contents

Executive summary	i
PART A: INTRODUCTION AND BACKGROUND TO THE PROJECT	1
1. Introduction	1
1.1 The requiring authorities / applicants.....	1
1.2 Transmission Gully Project	2
1.3 Purpose and scope of this report	5
1.4 Integrated engineering and environmental assessment process	8
1.5 Structure of this report	9
1.6 Requiring authority status	10
1.7 Consideration of the Project as a proposal of national significance.....	11
1.8 Aspects not covered in this report	11
2. Background to the Project	15
2.1 Introduction	15
2.2 Development of the Project	15
2.3 Strategic context of the Project.....	24
2.4 Benefits of the Project	29
2.5 NZTA and PCC objectives.....	39
PART B: STATUTORY CONTEXT	40
3. Resource Management Act 1991	40
3.1 Introduction	40
3.2 Purpose and principles of the RMA	40
3.3 Proposals of national significance.....	42
3.4 Notices of Requirement by the NZTA and PCC.....	43
3.5 Outline plans.....	45
3.6 Land subject to existing designations	46
3.7 Project designations to be reviewed after construction.....	47
3.8 Applications for resource consent.....	47
3.9 Activities requiring resource consent	49
3.10 Resource consents sought for the Project	52
3.11 Consideration of applications for resource consent.....	60
4. Statutory considerations	64
4.1 Introduction	64
4.2 National policy statements	64

4.3	New Zealand Coastal Policy Statement 2010	66
4.4	Regional policy statements and proposed regional policy statements	66
4.5	Regional plans.....	68
4.6	District plans.....	70
4.7	National environmental standards	74
4.8	Other regulations	76
4.9	Other relevant matters	76
5.	Additional considerations	81
5.1	Introduction	81
5.2	NZTA's operating principles and functions.....	81
5.3	PCC's purpose and functions	83
5.4	Acquisition of land required for the Project.....	84
5.5	Archaeological sites affected by the Project	84
5.6	Reserves	84
5.7	Relocation of protected species	86
5.8	Provision of fish passage in certain waterways	86
5.9	Public walkways affected by the Project	87
	PART C: DESCRIPTION OF THE ENVIRONMENT.....	88
6.	Description of the environment.....	88
6.1	Introduction	88
6.2	Land use and topography	89
6.3	Geology	101
6.4	Natural hazards.....	101
6.5	Climate	105
6.6	Hydrology	106
6.7	Terrestrial ecology	112
6.8	Freshwater ecology	115
6.9	Marine ecology.....	116
6.10	Air quality	118
6.11	Noise	119
6.12	Transport networks	119
6.13	Network utilities.....	121
6.14	Social environment	124
6.15	Archaeology, culture and heritage	132
	PART D: DESCRIPTION OF THE PROJECT.....	135
7.	Operation of the Project.....	135
7.1	Introduction	135

7.2	Design philosophy of the Project	136
7.3	Road design	141
7.4	Traffic services	145
7.5	Interchanges	146
7.6	Pavements and surfacing	147
7.7	Walkways, cycleways and bridleways	148
7.8	Permanent access tracks for maintenance activities	149
7.9	Cut and fill slopes	150
7.10	Bridges	153
7.11	Vertical retaining walls	161
7.12	Noise attenuation	162
7.13	Culverts and erosion control and protection structures	162
7.14	Permanent stream realignment	168
7.15	Operational drainage and stormwater treatment	169
7.16	Landscaping	171
8.	Construction of the Project	172
8.1	Introduction	172
8.2	Enabling works	173
8.3	Site compounds	176
8.4	Materials required for construction	179
8.5	Water requirements for construction	179
8.6	Construction programme	180
8.7	Erosion and sediment control	180
8.8	Works in streams	183
8.9	Earthworks	183
8.10	Bridges	186
8.11	Protection and/or relocation of existing network utilities	186
8.12	Works to existing State highways	186
	PART E: CONSIDERATION OF ALTERNATIVES	188
9.	Assessment of alternatives	188
9.1	Introduction	188
9.2	Scope and purpose of assessment	188
9.3	Option evaluation and design process (Phases 1 and 2)	190
9.4	Summary of key options selected during Phase 1	195
9.5	Summary of key options selected during Phase 2	197
	PART F: CONSULTATION AND ENGAGEMENT	203
10.	Consultation and engagement	203

10.1	Introduction	203
10.2	Statutory framework.....	204
10.3	Previous consultation and engagement on the Project.....	206
10.4	Consultation and engagement objectives.....	207
10.5	Consultation and engagement process	208
10.6	Consultation and engagement methods.....	208
10.7	Summary of Phase 2 consultation and engagement outcomes	208
10.8	Consultation on the Porirua Link Roads	215
10.9	Future consultation and communication	216
PART G: ASSESSMENT OF EFFECTS ON THE ENVIRONMENT		217
11. Summary of environmental effects.....		217
11.1	Introduction	218
11.2	Summary of effects	218
12. Assessment methodology		226
12.1	Introduction	226
12.2	Purpose of the assessment	226
12.3	Previous environmental assessments	226
12.4	Environmental assessment undertaken during Phase 1	227
12.5	Assessment methodology.....	228
12.6	Structure of the assessment	230
13. Traffic and transport		232
13.1	Introduction	232
13.2	The existing transportation and traffic environment.....	233
13.3	Traffic and transport issues and objectives	236
13.4	Methodology for assessing effects.....	237
13.5	Traffic model forecasts.....	240
13.6	Operational traffic and transport effects	244
13.7	Assessment of construction traffic effects.....	255
13.8	Measures to avoid, remedy or mitigate actual and potential adverse traffic and transport effects.....	259
14. Land use and property effects.....		262
14.1	Introduction	262
14.2	Land acquisition and occupation.....	263
14.3	Access, easements and other property rights.....	264
14.4	Properties within close proximity.....	264
15. Network utilities.....		266

15.1	Introduction	266
15.2	Existing environment – Network utilities	266
15.3	Assessment of effects on network utilities	269
16.	Noise and vibration	278
16.1	Introduction	278
16.2	Existing noise levels	278
16.3	Assessment of noise effects	279
16.4	Assessment of vibration effects	285
17.	Air quality	287
17.1	Introduction	287
17.2	Existing air quality	287
17.3	Assessment of effects on air quality	289
17.4	Measures to avoid, remedy or mitigate potential adverse effects on air quality	295
18.	Contaminated land	296
18.1	Introduction	296
18.2	Existing environment – Contaminated land	296
18.3	Assessment of effects	299
18.4	Measures to avoid, remedy, mitigate or offset potential adverse effects	301
19.	Hydrology	302
19.1	Introduction	302
19.2	Existing hydrological environment	303
19.3	Hydrological modelling and drainage design	307
19.4	Assessment of hydrological effects during construction	310
19.5	Assessment of hydrological effects during operation	311
19.6	Effects on groundwater hydraulics	327
20.	Water quality	328
20.1	Introduction	329
20.2	Existing water quality	329
20.3	Water quality modelling	331
20.4	Water quality effects during construction	335
20.5	Water quality effects during operation	347
21.	Terrestrial ecology	356
21.1	Introduction	356
21.2	Existing terrestrial ecology	357
21.3	Assessment of effects on terrestrial ecology during construction	367

21.4	Assessment of operational effects on terrestrial ecology	369
21.5	Measures to avoid, remedy or mitigate potential adverse effects on terrestrial ecology	371
22.	Freshwater ecology	374
22.1	Introduction	375
22.2	Ecological investigations.....	375
22.3	Existing freshwater ecosystem.....	375
22.4	Assessment of construction effects on freshwater ecology	389
22.5	Assessment of operational effects on freshwater ecology.....	392
23.	Marine ecology	399
23.1	Introduction	399
23.2	Ecological investigations and modelling.....	400
23.3	Existing marine ecosystems.....	400
23.4	Construction effects on marine ecology	406
23.5	Operational effects on marine ecology.....	411
24.	Tangata whenua	412
24.1	Introduction	412
24.2	Existing environment – tangata whenua	413
24.3	Assessment of effects on tangata whenua.....	416
24.4	Measures to avoid, remedy, mitigate or offset potential adverse effects on tangata whenua.....	419
25.	Landscape and visual	421
25.1	Introduction	421
25.2	Existing environment – Landscape and visual.....	421
25.3	Actual and potential visual and landscape effects.....	425
26.	Archaeology and built heritage.....	438
26.1	Introduction	438
26.2	Existing environment – Archaeology and built heritage	438
26.3	Assessment of effects on archaeology and built heritage	440
26.4	Measures to avoid, remedy, mitigate or offset potential adverse effects on archaeology and built heritage	442
27.	Social effects	445
27.1	Introduction	445
27.2	Existing social environment.....	445
27.3	Assessment of social effects during construction	448
27.4	Assessment of social effects from operation	450

27.5	Measures to avoid, remedy or mitigate potential adverse social effects	456
PART H: MANAGEMENT OF ENVIRONMENTAL EFFECTS		458
28.	Environmental management and monitoring.....	458
28.1	Introduction	458
28.2	Project delivery framework	459
28.3	Management plan framework	462
28.4	Summary of mitigation, monitoring and other measures to manage adverse effects.....	470
28.5	Proposed conditions.....	489
29.	Proposed designation conditions.....	490
29.1	Guide to reading the conditions.....	490
29.2	Proposed NZTA designation conditions.....	490
29.3	Proposed PCC designation conditions	505
30.	Proposed resource consent conditions.....	516
30.1	Guide to reading the conditions.....	516
30.2	Proposed NZTA resource consent conditions	516
30.3	Proposed PCC resource consent conditions.....	542
PART I: STATUTORY ASSESSMENT		558
31.	Approach to the assessment.....	558
31.1	Introduction	558
31.2	Approach to statutory planning assessment.....	559
32.	Statutory assessment.....	565
32.1	Introduction	565
32.2	National Policy Statement for Freshwater Management 2011	567
32.3	National Policy Statement for Electricity Transmission 2008	570
32.4	NZ Coastal Policy Statement 2010.....	570
32.5	Proposed National Policy Statement on Biodiversity.....	574
32.6	Proposed Regional Policy Statement.....	575
32.7	Wellington Regional Policy Statement 1995.....	586
32.8	Regional Freshwater Plan for the Wellington Region 1999	586
32.9	Regional Air Quality Management Plan for the Wellington Region 2000	598
32.10	Regional Coastal Plan for the Wellington Region 2000.....	599
32.11	Wellington Regional Plan for Discharges to Land 1999	600
32.12	Regional Soil Plan for the Wellington Region 2000	601
32.13	District plans.....	602

32.14 National environmental standards 613

32.15 Other relevant documents 614

32.16 Assessment of section 105 matters 621

32.17 Assessment of section 107 matters 621

32.18 Assessment of Part 2 matters 623

List of figures

Figure 1.1: Components of the Project	3
Figure 1.2: Notices of Requirement for the Project	7
Figure 2.1: Key events in the development of the Project.....	16
Figure 2.2: Southern connection options considered	20
Figure 2.3: The Project within the context of the Wellington RoNS	25
Figure 2.4: Aerial view of a coastal section of existing SH1 between Paekakariki and Pukerua Bay	31
Figure 2.5: Liquefaction hazard area along existing SH1 between Linden and MacKays Crossing	32
Figure 2.6: Damage to road from liquefaction and lateral spreading during the 1931 Napier earthquake	33
Figure 6.1: The Project area, including the Main Alignment corridor, Kenepuru Link Road area and Porirua Link Roads area.....	91
Figure 6.2: Land use in Section 1: MacKays Crossing	92
Figure 6.3: Land use in Section 2: Wainui Saddle	93
Figure 6.4: Land use in Section 3: Horokiri	94
Figure 6.5: Land use in Section 4: Battle Hill.....	95
Figure 6.6: Land use in Section 5: Golf Course	96
Figure 6.7: Land use in Section 6: State Highway 58	97
Figure 6.8: Land use in Section 7: James Cook	98
Figure 6.9: Land use in Section 8: Cannons Creek	99
Figure 6.10: Land use in Section 9: Linden	100
Figure 6.11: Faultlines in the Project area.....	102
Figure 6.12: Hydrological catchments and watersheds within the Project area	107
Figure 6.13: Like many of the waterways in the Kenepuru Stream catchment, parts of Cannons Creek have been significantly modified	111
Figure 6.14: <i>Peripatus novaezealandiae</i>	113
Figure 6.15: The Horokiri Stream provides significant freshwater habitat on the western coast of the Wellington region.....	115
Figure 6.16: Looking northwest over the Pauatahanui Inlet with the Pauatahanui wetland in the foreground and the suburb of Whitby to the left of the Inlet.....	117
Figure 6.17: The existing PKK-TKR-A line looking southwards down the Horokiri Stream valley	123
Figure 6.18: Recently upgraded Waitangirua park.....	127
Figure 6.19: Existing SH1 at Linden	128
Figure 6.20: Regional parks in the Project area.....	129
Figure 6.21: Queen Elizabeth Park	130
Figure 6.22: Belmont Regional Park.....	131
Figure 6.23: Battle Hill Farm Forest Park.....	131

Figure 6.24: Brick fuel tank at the bottom of the Te Puka Valley, near MacKays Crossing	133
Figure 7.1: Longitudinal profile of the Main Alignment showing the predicted heavy vehicle travel speeds and the location of crawler / auxiliary lanes.....	139
Figure 7.2: Typical form of a benched cut slope	151
Figure 7.3: Example of a reinforced soil embankment under construction. Over time the slope face would be expected to re-vegetate.....	153
Figure 7.4: Example of an MSE wall with concrete panel facing	161
Figure 8.1: Indicative main site compound layout.....	177
Figure 8.2: Indicative haul road configuration for large cut slopes	184
Figure 8.3: Indicative excavation method for cut slopes	184
Figure 9.1: Road alignment evaluation process	192
Figure 13.1: Predicted traffic volumes on new roads created by the Project	241
Figure 13.2: Predicted traffic volumes on existing State highways	242
Figure 13.3: Predicted traffic volumes on existing local roads	243
Figure 13.4: Comparison of forecast total travel demand in person trips for key journeys for a typical weekday (2026), with and without the Project	246
Figure 18.1: Sites investigated for potentially contaminated land	298
Figure 19.1: Like many of the waterways in the Kenepuru Stream catchment, parts of Cannons Creek have been highly modified	306
Figure 19.2: Difference in peak water levels with and without the Project for a Q100 event.....	313
Figure 19.3: Comparison of peak water velocity in Wainui stream between pre and post construction scenarios for a Q10 event.....	314
Figure 19.4: Comparison of peak water velocity in Te Puka stream between pre and post construction scenarios for a Q100 event.....	315
Figure 19.5: Peak inundation levels around Bridge 4, with Project in a Q100 event	317
Figure 19.6: Peak inundation levels around Bridge 6, with Project in a Q100 event	319
Figure 19.7: Comparison in a Q100 event of the peak water levels in the post and pre-construction situations with the inclusion of a new 28m span bridge across the Pauatahanui Stream.....	322
Figure 19.8: Comparison in a Q10 event of the peak water levels in the post and pre-construction on the Waitangirua stormwater network	325
Figure 19.9: Comparison in a Q100 event of the peak water levels in the post and pre-construction on the Linden stormwater network	326
Figure 20.1: Modelling undertaken to assess water quality effects from construction.....	332
Figure 20.2: Modelling undertaken to assess water quality effects during operation	334
Figure 20.3: TSS concentration across representative sample locations.....	351
Figure 20.4: Zinc concentration across representative sample locations.....	352
Figure 20.5: Copper concentration across representative sample locations.....	353
Figure 20.6: TPH concentration across representative sample locations (CLM)	354
Figure 21.1: <i>Leptinella tenella</i>	359
Figure 22.1: Upper Te Puka Stream	376
Figure 22.2: Mid Te Puka Stream.....	377

Figure 22.3: Upper Horokiri Stream.....	378
Figure 22.4: Mid Horokiri Stream, with gorse covered riparian margins	379
Figure 22.5: Mid Ration Stream with low flows and bank modification, running though the Pauatahanui golf course	380
Figure 22.6: Lower Pauatahanui Stream.....	381
Figure 22.7: One of the existing perched culverts (acting as barriers to fish passage) in Duck Creek	382
Figure 22.8: Un-named tributary of Porirua Stream	383
Figure 22.9: The proportion that the EPT taxa makeup of the total taxa present at each site...	386
Figure 22.10: MCI results for streams in the Project area.....	387
Figure 22.11: QMCI results for streams in the Project area	387
Figure 22.12: Wooden blocks bolted to culvert to improve fish passage	396
Figure 22.13: Example of a fish ladder.....	397
Figure 27.1: Community areas identified within the SIA.....	447
Figure 28.1: Overall Project delivery process	460
Figure 28.2: Proposed management plan framework	462
Figure 32.1: Hierarchy of relevant planning documents.....	566

List of tables

Table 1.1: NoRs for the Project	6
Table 1.2: Structure of this report	9
Table 1.3: Existing Transmission Gully, State highway and link road designations	13
Table 2.1: Characteristics of most likely major earthquake event in the Wellington region	34
Table 2.2: Comparison of estimated closure periods after a major earthquake event for proposed Main Alignment and existing SH1	35
Table 2.3: Travel time reductions resulting from the Project at peak times	37
Table 3.1: Existing designations over land to which the NoRs relate	46
Table 3.2: Groups of activities resource consent is being sought for	53
Table 3.3: Resource consents sought for the Project	54
Table 5.1: Parks and reserve land required for the Project	86
Table 6.1: Sections of the Main Alignment corridor	90
Table 6.2: Faults within the Project area	103
Table 6.3: Climate of the Wellington region	105
Table 6.4: Estimated worst-case background contaminant levels for air quality in urban settings in the Project area	118
Table 6.5: Estimated worst-case background contaminant levels for air quality in rural settings within the Project area	118
Table 7.1: Estimated traffic volumes for the Project	139
Table 7.2: Cut slope configurations	150
Table 7.3: Bridges currently proposed for the Project	155
Table 7.4: Schedule of proposed bridges (Schedule B)	158
Table 7.5: Culverts currently proposed for the Project (Schedule A)	163
Table 7.6: Proposed permanent stream realignment	169
Table 7.7: Proposed wetlands	170
Table 8.1: Proposed temporary culverts for construction access (Schedule C)	175
Table 8.2: Potential construction fronts	180
Table 9.1: Evaluation criteria for the preliminary screening	193
Table 11.1: Summary of actual and potential environmental effects	219
Table 12.1: Environmental effects assessment topics	230
Table 13.1: Local road traffic volume changes	245
Table 13.2: Crash analysis summary, detailing expected injury crashes in 2026 - with the Basecase / and with the Project	251
Table 13.3: Local road crashes and traffic volume changes	252
Table 13.4: SH1 intersection crashes and traffic volume reductions	253
Table 13.5: Proposed methods to manage construction traffic effects	260
Table 13.6: Methods to manage operational traffic effects	261
Table 16.1: NZS 6806 categories	281
Table 16.2: Predicted noise levels for the Do Minimum scenario	282

Table 16.3: Areas where noise mitigation was not recommended	284
Table 16.4: Currently proposed noise mitigation.....	284
Table 17.1: Estimated worst-case background contaminant levels for air quality in urban settings in the Project area	288
Table 17.2: Estimated background contaminant levels for air quality in rural settings in the Project area.....	288
Table 19.1: Summary of hydrological risk assessment.....	309
Table 20.1: Summary of water quality measurements in relation to guideline values.....	330
Table 20.2: Proposed erosion and sediment control measures for the Project.....	336
Table 20.3: Percentage change in sediment deposition caused by the Project (2021)	339
Table 20.4: Stream sediment deposition	339
Table 20.5: Scenarios for event-based modelling of sediment in the Harbour.....	342
Table 20.6: Areas of Porirua Harbour predicted to receive greater than 100mm, 200mm and 300mm of sediment deposition 20 years after commencement of construction of the Project	344
Table 20.7: Proposed wetland locations	348
Table 20.8: Proposed stormwater treatment by catchment	350
Table 20.9: Percentage change in contaminant loads (2031)	355
Table 21.1: Relevant protected natural areas and significant natural areas within the Project area	361
Table 21.2: Advance ecological mitigation planting.....	364
Table 21.3: Magnitude of terrestrial vegetation loss and modification (without mitigation)	367
Table 21.4: Mitigation for vegetation loss	372
Table 21.5: Mitigation planting for terrestrial vegetation loss.....	372
Table 22.1: Freshwater fish species in streams in the Project area	384
Table 22.2: MCI & QMCI score classification meanings	385
Table 22.3: Ecological value of streams in the Project area	388
Table 22.4: Average turbidity levels of selected streams.....	390
Table 22.5: Sediment yield estimates during construction for storm events (with mitigation) ..	390
Table 22.6: Magnitude of freshwater habitat loss and modification (without any mitigation) ...	393
Table 22.7: Calculation of freshwater habitat compensation required	395
Table 22.8: Comparison of zinc and copper discharge in 2031, without Project and with Project (no stormwater treatment) relative to ANZECC 95% ecological triggers.....	398
Table 23.1: Potentially ecologically significant sediment generating events	409
Table 23.2: Harbour area affected by long term (20 year) sediment accumulation.....	410
Table 23.3: Significance of long-term sediment re-deposition with the Porirua Harbour.....	411
Table 25.1: Summary of key measures to avoid, remedy or mitigate effects.....	435
Table 28.1: Proposed management of environmental effects via management plans.....	468
Table 28.2: Proposed mitigation and monitoring.....	470
Table 31.1: Relevant assessment matters under section 104 of the RMA	563

Executive summary

Introduction

The Transmission Gully Project (the Project) is being promoted by the NZ Transport Agency (NZTA) and Porirua City Council (PCC). The Project consists of three components:

- The Transmission Gully Main Alignment (the Main Alignment) involves the construction, operation and maintenance of a State highway formed to an expressway standard from Linden (Wellington City) to MacKays Crossing (Kapiti Coast). The NZTA is responsible for the Main Alignment.
- The Kenepuru Link Road involves the construction, operation and maintenance of a limited access State highway connecting the Main Alignment to the existing western Porirua road network. The NZTA is responsible for the Kenepuru Link Road.
- The Porirua Link Roads involves the construction, operation and maintenance of two local roads (the Whitby Link Road and the Waitangirua Link Road) connecting the Main Alignment to the existing eastern Porirua road network. PCC is responsible for the Porirua Link Roads.

The NZTA and PCC are lodging notices of requirement for designations (NoRs) and applications for resource consents for their respective components of the Project under the relevant provisions of the RMA. The Project is a proposal of national significance and has been lodged with the Environmental Protection Authority (EPA). The NZTA and PCC request that the Minister for the Environment makes a direction that the Project be referred to a board of inquiry for determination.

Background to the Project

The Project has a long history with the concept of an inland alternative route for SH1 between Wellington City and the Kapiti Coast being discussed for many decades. A number of strategic studies and investigations have concluded that an inland alternative for SH1 is preferable to an upgrade of the existing coastal route for SH1 as it will provide greater benefits in terms of travel time savings, safety and route security. Accordingly, the Project is a key component of a number of national, regional and local transport strategies, policies and plans.

Benefits of the Project

The Project will provide the following benefits:

- improved **route security and resilience** of the Wellington Region's State highway network;
- improved **safety** performance as compared to the existing State Highway 1 between Linden and MacKays Crossing;
- reduced **travel times** and improved travel time reliability along key routes and increased accessibility across many parts of the Region's road network;

- reduced severance for existing SH1 coastal **communities**;
- **economic benefits** resulting from travel time savings, improved trip time reliability and increased accessibility to and throughout the Wellington Region; and
- improved **accessibility** to eastern (the Porirua Link Road) and western (the Kenepuru Link Road) Porirua.

Statutory context

The NZTA has lodged four NoRs for the Main Alignment across four districts; Kapiti Coast District, Upper Hutt City, Porirua City and Wellington City. The NZTA has lodged two NoRs for the Kenepuru Link Road in the districts of Porirua City and Wellington City. PCC has lodged two NoRs for two other Link Roads within Porirua City. Applications for resource consent have also been lodged.

The consenting authority (which may be a Board of Inquiry) who considers the NoRs and applications for resource consent must have regard to various matters, including the relevant provisions of national, regional and district level planning documents, the alternatives, reasonable necessity, as well as other matters.

Description of the environment

The Project mainly traverses through rural land. However, the southern end of the Project area lies in the vicinity of the residential suburbs of Whitby, Waitangirua, Cannons Creek, Ranui Heights, Linden and Tawa. Whitby is one of the region's most affluent suburbs, while Waitangirua and Cannons Creek are two of the poorest suburbs.

The Project area is highly modified and consists almost entirely of pasture. Within this, however, there are pockets of both native and exotic (mainly forestry) vegetation. The highly modified nature of the area means that it holds little ecological value in terms of providing habitat for terrestrial species. The Project traverses nine hydrological catchments which are part of four different watersheds. The ecological value of the streams in these catchments varies from high to low but all streams are in highly modified catchments. Five of the catchments (approximately 65% of the length of the Project area) drain into the Pauatahanui Inlet. This Onepoto Arm is of significant ecological value, supporting a wetland and estuarine ecosystem.

A range of network utilities are present throughout the Project area, the most significant being a 110kV electricity transmission line (from which the Project takes its name).

An assessment of the Project area has concluded that there are relatively few archaeological, historical or cultural features of note.

Description of the Project

The Main Alignment has been designed to an expressway standard, which comprises a minimum of four lanes with continuous median separation. Direct access to and from the Main Alignment will not be permitted, except via three new interchanges and the northern and southern tie-ins. At all interchanges the Main Alignment will go over the connecting roads. Along some parts of the Main Alignment where

grades will be steeper, crawler lanes will be provided for slow moving vehicles (e.g. heavy vehicles). The Kenepuru Link Road has been designed as a State highway with strictly controlled direct access. The Porirua Link Roads have been designed to local road standards.

The Project involves approximately 112 stream crossings by either bridges or culverts. All bridges have been designed so there are no piers in the wetted stream channel. Culverts and bridges will include necessary erosion protection. The Project will require the permanent realignment of approximately 6.5km of streams.

A range of options are proposed for the treatment of cut slope and fill embankments. The three main options are reinforced soil embankments, mechanically stabilised earth walls (typically around bridges) and soil nail walls. Indicative landscaping has been developed for finished cut and fill slope faces. Stormwater runoff will be collected and treated using wetlands and proprietary treatment devices.

Enabling works will involve works to the existing electricity transmission lines (the Transmission Line Relocation Project) and the formation of construction access tracks and site compounds. The main site compound will be located next to the proposed SH58 Interchange and will be accessed directly from SH58. This will contain a concrete batching plant.

Construction will be staged with a number of crews working simultaneously on different fronts. It is expected that there will be up to 12 earthworks crews and eight bridge crews working during peak construction. Comprehensive erosion and sediment control measures will be used for all earthworks and for works in and around streams. Construction will involve approximately 6.3M m³ of cut material and approximately 5.8M m³ of fill material. Potential disposal sites for surplus fill have also been identified.

Construction of the Project is expected to take approximately six years. Construction will cause minimal disruption to the existing State highway network with works only needed to the existing State highway for the northern and southern tie-ins of the Main Alignment and around SH58 at Pauatahanui.

Consideration of alternatives

A consideration of alternatives is required under the provisions of the RMA; in relation to the NoRs and in relation to some aspects of the activities for which resource consent is sought.

An extensive option evaluation exercise was undertaken during the scheme assessment phase and this resulted in some fundamental alignment decisions that provide environmental (particularly ecological) benefits over the existing designated alignment. In particular, through the Te Puka and Horokiri valleys and Battle Hill, the road alignment was shifted to the west to reduce the impact on streams and terrestrial habitats. During the scheme assessment, the interchange connecting to eastern Porirua (via the Porirua Link Roads) was also relocated in the design to enable an additional local road connection from Whitby (rather than just from Waitangirua).

During the most recent engineering and environmental assessment phase, further design refinements have been made. Relatively minor alignment changes have avoided the loss of some features, such as a significant area of native bush through the Wainui Saddle and a heritage feature (WWII brick fuel tank) at the bottom of the Te Puka valley.

Consultation and engagement

Consultation has been undertaken in accordance with recognised good practice. Consultation during this phase of the Project has involved engagement with local, regional and national stakeholders. Consultation has involved a number of methods, as appropriate, including one-on-one meetings, group meetings, public open days, newsletters and online material.

On-going consultation and communication with the relevant regulatory agencies has also been undertaken as part of the preparation of consenting documentation. Consultation and engagement with tangata whenua (Te Runanga o Toa Rangatira Inc) has been undertaken by the NZTA, following on from previous engagement during the development of the Project design. Te Runanga o Toa Rangatira Inc (Ngati Toa) has prepared a cultural impact assessment for the Project.

Assessment of effects on the environment

In accordance with best practice and the relevant provisions of the RMA, an Assessment of Effects on the Environment (AEE) of the Project has been carried out. The process built on relevant environmental assessment information, from the scheme assessment (Phase 1). The environmental assessment undertaken for Phase 2 has been further informed by the work of a wide range of engineering and environmental specialists working together on the design and assessment of the Project. The AEE concludes that the Project will have a number of positive benefits as well as some actual or potential adverse effects (particularly during construction). The latter will vary in significance, scale (local, regional and national), intensity and duration.

Traffic and transport

The Project will have significant positive transport effects at a local, regional and national scale, including:

- improved route security and resilience for the region's State highway network
- improved safety and reduced crash risk;
- significant travel time savings;
- more efficient freight movement and associated economic benefits;
- improved connections to regional freight hubs, including the port, airport and distribution centres; and
- improved access to eastern Porirua (Porirua Link Roads) and western Porirua (Kenepuru Link Road).

During construction of the Project there will be some potentially adverse traffic effects, including delays or inconvenience, arising from increased heavy construction traffic using local roads. These effects can be effectively managed through traffic management plans which include means to manage such effects.

Land use and property effects

The main property effects of the Project can be separated into three broad categories:

- properties with land that is directly required (either the whole or in part) for the Project;
- land with an easement or other property right (including rights of way and water rights, for example) that is directly affected by the Project; and
- properties within close proximity to the Project.

The land holdings range from Crown Land, Council owned land including road and reserves, and private land. By far the largest land requirement is land already owned by the Crown for roading purposes. There are some properties where part acquisition will be required. All property owners whose land is directly affected have been consulted and are aware of the property required. There are a number of instances where the Project will affect other property rights such as physical access to a property, forestry logging accesses or a water supply arrangement. It is considered that effects on other property rights have been well identified through both property agreements and consultation.

Properties within close proximity to the route that have been identified as being subject to or particularly sensitive to effects have been identified through the technical studies. Actual and potential effects on these properties have been identified in relation to specific technical areas and appropriate mitigation has been devised. Actual and potential (including perceived) effects on property values is not considered to be a relevant consideration under the RMA. Effects on amenity values are a relevant consideration, and those that are affected by the Project are considered through assessment of other actual and potential effects including noise, landscape and access.

Network utilities

The Project will affect a number of existing and proposed network utilities within the Project area. This will require the protection and/or relocation of these utilities. Largely these works will be undertaken as enabling works for the Project. The most significant network utility affected is the electricity transmission line which runs much of the length of the Main Alignment. The NZTA, in liaison with PCC, has worked closely with the relevant organisations and are jointly confident that all adverse effects on network utilities will be able to be managed appropriately.

Noise and vibration

The rural and sparsely populated nature of the majority of the Project area means that specific noise and vibration mitigation is not required for most of the Project.

Construction noise will generally be within the limits of NZS 6803:1999 and where construction works are proposed in close proximity to sensitive receivers (such as residential dwellings), a construction noise and vibration management plan is proposed which outlines protocols for engaging with affected parties and processes or measures which will minimise noise and disruption. Consequently, the AEE concludes that any potential adverse noise effects arising from construction will be able to be adequately managed.

Based on an acoustics assessment, a small number of areas potentially requiring specific noise mitigation were identified and assessed using the process set out in NZS 6806:2010. Proposed mitigation consists of noise barriers of varying types, and the modification of one building. With this mitigation in place, the effects of noise will be adequately mitigated.

The noise and vibration assessment concludes that any potential vibration effects, both from construction and operation of the Project, will be such that no specific mitigation will be necessary.

Air quality

Construction of the Project (particularly the earthworks and concrete batching) has the potential to generate dust which could have an adverse effect on air quality. This potential effect can be mitigated to an acceptable level through dust management measures, outlined in the construction air quality management plan.

The air quality assessment concludes that on a regional basis, there will be an overall reduction to public exposure to vehicle emissions on completion of the Project. There will be no material adverse effects on air quality arising from the Project's operation and hence, no mitigation is considered necessary.

Contaminated land

The majority of the existing areas identified as currently contaminated do not present a significant risk to human health or ecology. The highest risk areas are the portions of MacKays Crossing where the potential for unexploded ordinances (UXO) has been identified, the identified soil contamination at the Porirua Gun Club and former nursery and the potential presence of asbestos in building materials.

Contaminated land has the potential to affect human health and ecology during construction and operation of the Project. This potential effect can be avoided through remedial work and by placing a road on the contaminated soils and essentially capping the contamination. The soil will be excavated as part of construction and the upper layer of soil will be mixed with deeper layers that are not impacted by contaminants, essentially reducing concentrations of contaminants in the soil. The adverse effects associated with UXO can be avoided through investigation, careful excavation and management/disposal methods, and by observing appropriate protocols in the event of accidental UXO discovery. Remedial action may also be required.

Implementation of these measures, through the draft Contaminated Land Management Plan (CLMP), will enable any adverse effects arising from contaminated land during construction and operation of the Project to be appropriately managed.

Hydrology

The Project will result in changes to existing hydrology from land use changes and from changes to stream morphology. Hydrological and hydraulic modelling has been undertaken to inform the design and environmental assessment process. As a result of this closely integrated process, the majority of potential adverse hydrological affects have been avoided through refinements to the road and drainage design.

There are small changes in flood risk in Q100 events (i.e. extreme weather events) on some properties. In other locations, changes in flood flows are negligible and in some instances the Project results in a small reduction in downstream flood risk by containing and managing flows.

The stream realignments for the Project and the stream crossings (bridges and culverts) have been assessed in the AEE and will result in negligible changes to hydraulic performance of the affected stream. This potential effect is largely able to be mitigated by constructing realigned streams as close as possible to their existing form. While this reconstruction is primarily being done for ecological reasons, it also minimises changes to hydraulic performance.

Water quality

The construction and operation of the Project has the potential to adversely affect water quality in streams and the marine environment. Construction of the Project will involve major earthworks and has the potential to increase sediment run off to streams and the coast. Operation of the Project has the potential to increase contaminant levels in streams and the marine environment associated with stormwater runoff from road surfaces.

Existing freshwater quality in streams is variable. Virtually all streams affected by the Project have elevated nutrient levels, which is typical of the predominantly pastoral land use through most of the Project area. Levels of turbidity and metals are generally within guideline values with the exceptions being the more urbanised catchments of Kenepuru and Porirua. Water quality within Porirua Harbour varies but contaminant levels (zinc, copper and lead) are typically elevated around stormwater outfalls in the Onepoto Arm. DDT concentrations are elevated in the Porirua Harbour, which is likely to be as a result of historical land uses.

Land use within catchments draining into the Harbour also influences sediment entering the Harbour. Pastoral farming and forestry activities both result in high levels of sediment reaching the harbor. Significantly less sediment runoff is generated from native forested land.

A high level of erosion and sediment control will be used to manage sediment from the construction of the Project entering waterbodies. High rainfall events could cause an increase in sediment reaching the streams and the Harbour. Increases in suspended sediment will occur but will mimic what currently occurs during these events and will not cause any lasting adverse effects. Increases in sediment deposited in streams from these events will be minimal. For most events, the additional sediment entering the Harbour will deposit in areas where high levels of sediment deposition is already occurring and therefore is likely to have minimal impact. An exception to this is in when specific combinations of wind and rainfall events occur when large areas of earthworks are in progress. If all these things occur together, deposition is predicted in the intertidal zones near the coast.

All stormwater runoff from finished road surfaces will be treated. As a result, contaminants entering the Wainui Stream mouth and Onepoto Arm will decrease, providing a positive effect. Contaminant levels entering the Pauatahanui Inlet will mostly remain unchanged, with the exception of total petroleum hydrocarbons which will increase. This increase will not cause conspicuous oil or grease in the water or any change in odour.

Terrestrial ecology

The Project traverses highly modified land, which has mainly been converted to pasture with relatively few areas of native vegetation remaining. Within this modified landscape populations of indigenous

fauna are small and species of conservation interest are restricted to specific sites, typically associated with fragments of native vegetation.

A conservative approach has been taken to quantifying the loss of vegetation and terrestrial habitats and to developing mitigation measures. Mitigation sites have been identified for retirement and revegetation, including the early retirement sites established in recent years by the NZTA. The sites have been chosen for the range of potential ecological and hydrological benefits they can provide.

Adverse effects of construction can be adequately addressed by mitigation in these areas, and will include retirement from farming and replanting in some areas. The retirement and revegetation of land above the Project alignment will provide additional benefits such as reduced erosion, and improved water quality.

There will be some potential effects on the habitat of terrestrial fauna. This will be minor as they can be effectively managed by the translocation of some species (e.g. lizards) and/or habitats (e.g. logs and boulders providing *Peripatus* habitat) and by careful construction management methods.

Freshwater ecology

The Project involves works in nine separate catchments across four watersheds. The streams in these catchments currently provide varying qualities of habitat for freshwater species, although all are in heavily modified catchments and the habitat values and species composition are reflective of this.

During construction, sediment runoff from the earthworks has the potential to adversely affect freshwater habitats and species. A high level of erosion and sediment control measures are proposed and based on sediment modelling, levels of sediment entering streams during normal conditions are predicted to be low and the ecological impact of this is assessed to be negligible. As currently occurs, during, and immediately after high rainfall events, sediment levels in streams will rise. During the construction period the additional earthworks area for the Project will increase sediment levels in streams between 1 to 30% (in a Q2 event). The AEE concludes that given current experience this will not be considered to be ecologically significant because:

- freshwater species in these streams are currently able to tolerate temporary increases in sediment levels higher than this; and
- by definition, these events coincide with increased stream flows and the hydraulically active nature of the streams (e.g. they are in relatively steep terrain) means that sediment is rapidly transported downstream, rather than being deposited on stream beds (where greatest effect occurs).

The long term operation of the Project will require the modification of streams in eight of the nine catchments. Primarily this modification involves construction of culverts and bridges and the realignment of parts of streams as part of the hydraulic design of the Project. The AEE acknowledges that while considerable efforts have been made to reduce the degree of modification to streams, this cannot be avoided completely. The adverse effects on freshwater ecology resulting from stream works can be remediated and/or mitigated by restoring and protecting other streams to enable no net loss of freshwater habitat. In total, approximately 10.5km of streams will be affected (through stream realignment and/or armoring) and this will require the restoration and protection of approximately

26.5km of streams to remedy and mitigate this. As part of the overall mitigation package of the Project, approximately 30km of streams will actually be restored and protected, meaning the Project will result in a net gain in freshwater habitat across the Project area. This positive effect will be on-going as the areas retired from pasture (predominantly in the Te Puka and Horokiri catchments) are to be re-planted in native vegetation.

Stormwater runoff from the road surfaces will be treated to a high standard and will have negligible, if any, impacts on freshwater ecology against the anticipated background contaminant loading.

Marine ecology

Although the Project does not involve works or the discharge of contaminants into the coastal marine area, the marine environment is the ultimate receiving environment for sediment laden water from construction of the Project and stormwater runoff from the road surfaces from the operation of the Project. There are two marine receiving environments of relevance:

- the Kapiti Coast, comprising the mouths of the Wainui and Whareroa Streams; and
- the Porirua Harbour, comprising the Pauatahanui Inlet and the Onepoto Arm.

The mouths of the Wainui and Whareroa Streams are dynamic environments on the open coast. In contrast, the Porirua Harbour is more enclosed, accessible to the open coastal by a narrow 100m channel. Due to this and the fact that the Harbour is the receiving environment for approximately 80% of the discharges associated with the Project, ecological investigations have focused more (but not exclusively) on effects on the Harbour ecosystem.

Construction of the Project will result in increased levels of sediment entering the Harbour. Increased levels of suspended sediment as a result of high rainfall events are assessed to have negligible ecological effects. There are two rain events that, if they coincide with certain wind conditions, where deposited sediment on the seabed is predicted to have (Onepoto Arm) and (Pauatahanui Inlet) adverse ecological effects. While the potential ecological effects of sediment deposition resulting from these events is adverse, the number of factors required to occur simultaneously means that the actual chance of them occurring together relatively low.

Operation of the Project will involve the discharge of treated road runoff to the Porirua Harbour which will contribute to the long term accumulation of contaminants in central subtidal basins. Operational phase discharges to the marine environment adjacent to the Wainui and Whareroa Streams will be diluted and widely dispersed given the large, high energy receiving environment. Operational water quality effects are assessed as being minor

Tangata whenua

The protection of stream habitats and resident native fish species is the key matter of interest to Ngati Toa both during the construction and operational phases of the Project. Ngati Toa undertake customary food gathering within the Project area and there are areas of historical and cultural significance that must be taken into account. Part 2 of the RMA provides a framework for assessing the actual and potential effects of the Project on tangata whenua. Section 7(a) is of particular importance, where particular regard is given to kaitiakitanga.

There will be direct and indirect effects of construction on waterbodies during construction, the most significant of which is the potential for increased levels of sediment entering waterways from the large scale earthworks required for the Project. Once the Project is operational, there is potential for the discharge of contaminated stormwater from the road surface to local streams, with potential impacts on water and habitat quality, and effects on sensitive species; and a potential increase of stormwater and contaminant discharge to Porirua Harbour with potential impacts on habitats and sensitive species.

Ngati Toa has provided a cultural impact assessment for the Project, which concludes that the methods taken by the applicants to manage adverse effects on the environment are supported.

Landscape and visual

The proposed route and the significant engineering required to construct the Project means there are potential adverse effects on the natural character of wetlands, rivers and their margins, outstanding natural landscapes, visual amenity values, and physical landscape features. The scale of these effects varies as the road traverses through the landscape. Conversely, there is the potential for positive visual effects for users of the road who will travel through the bold natural landscapes that are largely inaccessible at present.

A number of general and specific measures are proposed which will avoid, remedy, mitigate or offset the adverse landscape and visual effects resulting from the construction and operation of the Project. These measures have been informed by the urban and landscape design principles developed for the Project and documented in the Urban and Landscape Design Framework.

The scale of the Project means that it will create a significant change to the environment. The landscape and visual effects of this change cannot be fully avoided. The approach taken has been to avoid effects as far as practicable and to implement a range of proposed measures will adequately manage the remaining adverse effects.

Archaeology and built heritage

There are no known archaeological or built heritage sites within the area proposed for the Main Alignment. However, there are two sites of built heritage significance in close proximity to the Main Alignment, which have the potential to be adversely affected by aspects of the Project's construction and operation.

At both locations, appropriate mitigation, monitoring and remedial action will be implemented (if required) to manage effects appropriately. One site of heritage significance (WWII brick fuel tank) is not easily viewed or accessible as it is located on private land. To increase public appreciation of the structure, the NZTA will provide a track to allow it to be accessed by the public, which would be a positive effect of the Project.

In addition, protocols will be followed in the event of accidental discovery of potential archaeological material appropriate protocols are followed.

Social effects

Construction and operation of the Project has the potential to generate adverse social effects as a result of noise and vibration, air quality, and traffic and access, affecting amenity, connectivity and movement, local character and recreation values. Measures outlined within the CEMP and its subsidiary plans for traffic, noise/ vibration and air quality will be used to manage any adverse effect on the social environment arising from construction. Once the Project is operational, it is anticipated that many of the proposed mitigation measures will also continue to mitigate any adverse social effects.

Management of environmental effects

Where practicable, potential adverse operational effects have been avoided or reduced through the integrated design process which involved a combination of disciplines working together through the process (e.g. changes made to improve the route, amending the designation footprint etc.). Measures to avoid, remedy and mitigate potential adverse construction effects have been developed through an iterative process with a particular focus on managing stream diversion, reclamation and structures. Potential on-going effects from operation of the Project will be appropriately managed through various measures including, for example, noise barriers, stormwater treatment, significant landscaping and land retirement across the Project area.

Monitoring will be undertaken prior to, during and following construction to provide a mechanism through which additional mitigation measures may be put in place, if necessary, to mitigate any actual or potential environmental effects. A comprehensive suite of conditions for the designations and resource consents has been proposed. A significant feature of the set of proposed conditions is to establish the proposed management plan and environmental monitoring framework.

As a result of the mitigation proposed, which can be delivered as conditions of the consents and designations, the potential adverse effects of the Project will be adequately and appropriately avoided, remedied or mitigated.

Statutory assessment

In this case, the NZTA's resource consent applications that relate to all streamworks and bulk earthworks are bundled together as they cannot occur separately. In this regard, under the GWRC Regional Plan, the NZTA streamworks and bulk earthworks are a non-complying activity (with the exception of the concrete batching plant, which is a discretionary activity) and the PCC Project is a discretionary activity.

There are a large number of objectives and policies relevant to the Project (from national, regional and district planning documents). The main conclusions of the statutory assessment contained in the AEE are:

- Overall, the Project is not inconsistent, and will give effect to (as relevant), the relevant objectives and policies of the statutory planning documents;

- The Project is a key part of the Wellington RoNS programme which will, as a whole, bring significant travel time savings between Wellington Airport and Levin, and ease freight movements into and out of Wellington – which is entirely consistent with the transport related policy in both the regional planning documents and the district plans;
- The Project will sustain the potential of natural and physical resources for future generations. It is intended to meet the growing transportation needs of the region and does not preclude future opportunities for other land transport development, such as public transport;
- The Project safe-guards the life supporting capacity of air, soils, water and ecosystems;
- The Project’s adverse effects on the environment are proposed to be avoided, remedied, or mitigated;
- The Project recognises and provides for the matters in section 6 of the RMA;
- The Project has also appropriately responded to those matters in sections 7 and 8 of the RMA.

Overall, the AEE concludes that the Project meets the statutory tests of the RMA.

The AEE concludes that the benefits of the Project, weighed alongside the proposed measures to avoid, remedy and mitigate the adverse effects, means the Project is consistent with the purpose and principles of the RMA, and consequently, the sustainable management purpose of the RMA will be achieved.