



MILL ROAD STAGE 1 – FAST TRACK APPROVALS ACT (FTAA) APPLICATION

PART D – STATUTORY ASSESSMENT

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Appendices

APPENDIX D1 TABLE OF RELEVANT PROVISIONS

1. Context

1.1 Relevant statutory considerations

This section of the SAR assesses the Project against the relevant matters set out in Schedule 5 of the FTAA, namely:

- Any relevant provisions of the documents listed in Clause 12(2) (set out in **Table 1-1** below); and
- Sections 5, 6, and 7 of the RMA.

Table 1-1 – Relevant statutory documents assessed

Relevant types of documents	Relevant documents
National environmental standards (NES)	- National Environmental Standard for Air Quality 2004 (NES-AQ); - National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 (NES-CS); - National Environmental Standards for Electricity Transmission Activities 2009 (NES-ET); and - National Environmental Standards for Freshwater 2020 (NES-FW).
National policy statements (NPS)	- National Policy Statement for Electricity Networks (NPS-EN); - National Policy Statement for Freshwater Management (NPS-FM); - National Policy Statement for Highly Productive Land (NPS-HPL); - National Policy Statement for Indigenous Biodiversity (NPS-IB); - National Policy Statement for Infrastructure (NPS-I); and - National Policy Statement on Urban Development (NPS-UD).
New Zealand Coastal Policy Statement (NZCPS)	The Project is located outside of the Coastal Marine Area (CMA). Accordingly, the NZCPS has not been identified as relevant to the Project.
Regional policy statements or proposed regional policy statement (RPS)	The following chapters of the RPS contained in the AUP are relevant to the Project: - B2 – Tāhuhu whakaruruhau ā-taone - Urban growth and form; - B3 – Ngā pūnaha hanganga, kawekawe me ngā pūngao - Infrastructure, transport and energy; - B5 – Ngā rawa tuku iho me te āhua - Historic heritage and special character; - B6 – Mana Whenua; - B7 – Toitū te whenua, toitū te taiao - Natural resources; and - B10 – Ngā tūpono ki te taiao - Environmental risk.
A plan or proposed plan	The following provisions of the AUP have been identified as relevant to the Project: - D9 – Significant Ecological Areas Overlay; - D17 – Historic Heritage Overlay; - D26 – National Grid Corridor Overlay; - E1 – Water quality and integrated management; - E3 – Lakes, rivers, streams and wetlands; - E7 – Taking, using, damming and diversion of water and drilling; - E8 – Stormwater – Discharge and diversion; - E9 – Stormwater quality – High contaminant generating car parks and high use roads; - E10 – Stormwater management area - Flow 1 and Flow 2; - E11 – Land disturbance – Regional;

Relevant types of documents	Relevant documents
	▪ E12 – Land disturbance – District; ▪ E14 – Air quality; ▪ E15 – Vegetation management and biodiversity; ▪ E16 – Trees in open space zones; ▪ E17 – Trees in roads; ▪ E25 – Noise and vibration; ▪ E26 – Infrastructure; ▪ E27 – Transport; ▪ E30 – Contaminated land; and ▪ E36 – Natural hazards and flooding.
A planning document recognised by a relevant iwi authority and lodged with a local authority	No planning documents recognised by a relevant iwi authority and lodged with a local authority have been identified as relevant in the context of the Project.

1.2 Approach to assessment

A full assessment of the Project against the relevant statutory provisions listed in **Table 1-1** is contained in **Appendix D1** under the following groupings:

- a) Enabling infrastructure while managing adverse effects;
- b) Urban growth and urban form;
- c) Ecology and natural resources;
- d) Natural hazards and environmental risk;
- e) Mana Whenua;
- f) Historic heritage; and
- g) Electricity transmission.

Having regard to the reasons for the alterations to the existing designations and the range of resource consents sought to implement the Project, it is considered that the key policy issues relevant to the Project can be grouped into the following themes:

- a) **Policy theme 1** – Enabling and recognising the benefits of infrastructure;
- b) **Policy theme 2** – Managing the effects of infrastructure on sensitive environments;
- c) **Policy theme 3** – Consideration of alternatives where certain effects arise; and
- d) **Policy theme 4** – Effects management.

2. Enabling and recognising the benefits of infrastructure

The objectives and policies of the NPS-I, NPS-IB and Chapters B3 and E26 of the AUP all recognise the essential role and inherent benefit of infrastructure in enabling social, economic, cultural, and environmental wellbeing. The provisions acknowledge the particular importance of transport infrastructure in facilitating the movement of people, goods, and services, and in enabling planned urban growth. Accordingly, the provisions anticipate and enable infrastructure activities.

The following objectives and policies in **Table 2-1** are relevant to enabling infrastructure.

Table 2-1 – Provisions of relevance to the ‘enabling and recognising the benefits of infrastructure’ policy theme

National Policy Statements	
NPS-I	
Objective	(1) The objective of this NPS is to: (a) Ensure the national, regional, and local benefits of infrastructure are provided for; (b) Enable infrastructure to support the social, economic, and cultural wellbeing of people and communities and their health and safety; (c) Enable infrastructure to support the development and change of urban and rural environments to meet the diverse and changing needs of present and future generations...
Policy 1	(1) Decision-makers must ensure that the national, regional or local benefits of infrastructure, relative to any localised adverse effects on the environment, are recognised and provided for. (2) Decision-makers must recognise that the benefits of infrastructure include: (a) Providing for the social, cultural and economic wellbeing of present and future generations; (b) Creating, supporting and enhancing well-functioning urban and rural environments; (c) Supporting sufficient development capacity to meet demand for housing and business land; (d) Providing services that are essential to support human life and the development, growth and functioning of districts, regions, New Zealand and the economy; (e) Helping to protect and restore the natural environment; (f) Supporting New Zealand’s emissions reduction targets and mitigating the effects of climate change; and (g) Reducing the risks from, and improving resilience to, natural hazards and climate change...
Auckland Unitary Plan	
B3 Ngā pūnaha hanganga, kawekawe me ngā pūngao - Infrastructure, transport and energy	
Objective B3.2.1(2)	The benefits of infrastructure are recognised, including: (a) Providing essential services for the functioning of communities, businesses, and industries within and beyond Auckland; (b) Enabling economic growth; (c) Contributing to the economy of Auckland and New Zealand; (d) Providing for public health, safety, and the well-being of people and communities; (e) Protecting the quality of the natural environment...
Policy B3.2.2(1)	Enable the efficient development, operation, maintenance, and upgrading of infrastructure.

Policy B3.2.2(2)	Recognise the value of investment in existing infrastructure.
Objective B3.3.1(1)	Effective, efficient, and safe transport that: (a) Supports the movement of people, goods, and services; (b) Integrates with and supports a quality compact urban form; (c) Enables growth; (d) Avoids, remedies, or mitigates adverse effects on the quality of the environment and amenity values and the health and safety of people and communities; and (e) Facilitates transport choices, recognises different trip characteristics, and enables accessibility and mobility for all sectors of the community.
Policy B3.3.2(1)	Enable the effective, efficient, and safe development, operation, maintenance and upgrading of all modes of an integrated transport system.
Policy B3.3.2(2)	Enable the movement of people, goods and services and ensure accessibility to sites.
Policy B3.3.2(3)	Identify and protect existing and future areas and routes for developing Auckland's transport infrastructure.
E26 – Infrastructure	
Objective E26.2.1(1)	The benefits of infrastructure are recognised.
Objective E26.2.1(2)	The value of investment in infrastructure is recognised.
Objective E26.2.1(3)	Safe, efficient and secure infrastructure is enabled, to service the needs of existing and authorised proposed subdivision, use and development.
Objective E26.2.1(4)	Development, operation, maintenance, repair, replacement, renewal, upgrading and removal of infrastructure is enabled.
Policy E26.2.2(1)	Recognise the social, economic, cultural and environmental benefits that infrastructure provides, including: (a) Enabling enhancement of the quality of life and standard of living for people and communities; (b) Providing for public health and safety; (c) Enabling the functioning of businesses; (d) Enabling economic growth; (e) Enabling growth and development; (f) Protecting and enhancing the environment; (g) Enabling the transportation of freight, goods, people; and (h) Enabling interaction and communication.

2.1 Assessment

As discussed in Part B, the Project responds to known corridor efficiency, safety, and network resilience problems in the southern Auckland network and will contribute to a well-functioning transport network. Under a 2031 assessment timeframe, implementation of the Project will result in improved traffic efficiency including a 25% reduction in peak travel times along the corridor, a 30% reduction in congested travel, and improved journey time reliability and corridor productivity. The Project will also:

- a) Improve the corridor's safety record (with a greater than 50% reduction in deaths and serious injuries over the same period); and
- b) Result in a more resilient transport network by introducing a viable alternative to SH1 for north-south travel.

These benefits are critical in serving both recent and planned growth in the wider area and support the objectives set out in the NPS-UD. For these reasons, the Project has been identified as a RoNS in the GPS

which are described as essential corridors that “will reduce congestion, improve safety, support housing development... boost economic growth, and provide a more resilient roading network.”¹

The Economic Benefits Report (refer to **Appendix B2**) has identified \$1.18 billion in construction phase benefits (accruing primarily to the construction, engineering, and professional services sectors); and \$5.66 billion in operational benefits (comprising traffic, safety, active mode, and resilience benefits; as well as wider economic benefits arising from business growth, workforce participation, and productivity gains associated with enhanced accessibility and connectivity). In terms of employment, the Project is estimated to contribute approximately 11,600 job years to the national economy.

The Project has also been identified through the SIA (**Appendix C12**) as providing significant accessibility, equity, health, and community safety benefits.

Given these benefits, the Project demonstrates alignment with the relevant objectives and policies in **Table 2-1** that seek to recognise and provide for infrastructure that supports social, economic and environmental wellbeing, and provides public benefit.

3. Effects of infrastructure on sensitive environments

The policy framework established under the NPS-I, NPS-IB, NPS-FM, the RPS, and the AUP provides for infrastructure to be established in areas with protected natural or physical resources, where there is a demonstrated functional and/or operational need to do so. Chapter E26 of the AUP provides a consenting pathway for the specific activities associated with infrastructure traversing such areas. Functional need² and operational need³ are defined as follows:

Functional need: *The need for a proposal or activity to traverse, locate or operate in a particular environment because it can only occur in that environment.*

Operational need: *The need for a proposal or activity to traverse, locate or operate in a particular environment because of technical or operational characteristics or constraints.*

As outlined below, the Project has a functional and/or operational need to be located within the following ecological features:

- a) Significant Ecological Areas at Everglade Park (SEA_T_538a), Puhinui Gully (SEA_T_4570), and Cheesman’s Bush (SEA_T_9102);
- b) Areas with indigenous biodiversity values (including habitat for native fauna);
- c) Existing natural inland wetlands; and
- d) Existing permanent and intermittent watercourses.

The following objectives and policies in **Table 3-1** are relevant to the Project.

Table 3-1 – Provisions of relevance to functional and/or operational need

National Policy Statements	
NPS-I	
Policy 2	(1) Decision-makers must recognise that infrastructure may have an operational need or functional need to operate in, be located in, or traverse particular locations and environments. (2) Decision-makers must recognise that the operational need or functional need of infrastructure includes, but is not limited to, the need to: (a) Provide services to people and communities in a timely, effective and efficient manner;

¹ Government Policy Statement on Land Transport 2024-34, page 11.

² AUP Chapter J1; NPS:FM Part 3, Clause 3.21

³ AUP Chapter J1

	(b) Operate effectively and efficiently as linear and/or interconnected infrastructure networks within and across district and regional boundaries; (c) Access or connect to particular natural or physical resources, including other infrastructure; (d) Be accessible so infrastructure activities can be undertaken effectively and efficiently; (e) Locate where the services are required, including in areas at risk to natural hazards, whether the infrastructure has been spatially identified in advance; and (f) Manage risks from natural hazards.
Policy 5	(1) Decision makers must recognise and provide for the role of infrastructure supporting activities, including by... ... (b) Recognising the operational need or functional need of some infrastructure supporting activities... to operate in, be located in, or traverse particular environments and locations...
Policy 7	(1) When assessing and managing the effects of infrastructure activities, decision-makers must... ... (b) Consider the technical and operational requirements and constraints of infrastructure activities.
NPS-FM	
Policy 6 and Part 3, Clause 3.22	There is no further loss of the extent of natural inland wetlands, their values are protected, and their restoration is promoted... Part 3, Clause 3.22 (1) ...Except where:... (b) The regional council is satisfied that... (i) The activity is necessary for the construction or upgrade of specified infrastructure; and (ii) The specified infrastructure will provide significant national or regional benefits; and (iii) There is a functional need for the specified infrastructure in that location; and (iv) The effects of the activity are managed through applying the effects management hierarchy.
NPS-IB	
Policy 7 and Part 3, Clause 3.10-3.11	Significant natural areas (SNAs) are protected by avoiding or managing adverse effects from new subdivision, use, and development. Part 3, Clause 3.11 (1) Clause 3.10(2) does not apply, and any adverse effects on an SNA on a new subdivision, use, or development must be managed in accordance with 3.10(3) and (4) if: (a) The new subdivision, use, or development is required for the purposes of any of the following... (i) Construction or upgrade... of specified infrastructure that provides significant national or regional benefit... (b) There is a functional and operational need for the new subdivision, use, or development to be in that particular location; and (c) There are no practicable alternative locations for the new subdivision, use, or development.

Auckland Unitary Plan	
B3 Ngā pūnaha hanganga, kawekawe me ngā pūngao - Infrastructure, transport and energy	
Objective B3.2.1(4)	The functional and operational needs of infrastructure are recognised.
Policy B3.2.2(3)	Provide for the locational requirements of infrastructure by recognising that it can have a function or operational need to be located in areas with natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage and special character.
D9 Significant Ecological Areas Overlay	
Policy D9.3(8)	Manage the adverse effects from the use, maintenance, upgrade and development of infrastructure in accordance with the policies above, recognising that it is not always practicable to locate and design infrastructure to avoid significant ecological areas.
E3 Lakes, rivers, streams and wetlands	
Objective E3.2(4)	Structures in, on, under or over the bed of a lake, river, stream or wetland are provided for where there are functional or operational needs for the structure to be in that location, or traverse that area.
Policy E3.3(17)(b)	The loss of extent of natural inland wetlands is avoided, their values are protected, and their restoration is promoted, except where... ... (b) the regional council is satisfied that... (i) the activity is necessary for the purpose of the construction or upgrade of specified infrastructure; and (ii) the specified infrastructure will provide significant national or regional benefits; and (iii) there is a functional need for the specified infrastructure in that location; and (iv) the effects of the activity are managed through applying the effects management hierarchy.
Policy E3.3(18)	The loss of river extent and values is avoided, unless the council is satisfied: (a) that there is a functional need for the activity in that location; and (b) the effects of the activity are managed by applying the effects management hierarchy.
E15 Vegetation management and biodiversity	
Policy E15.3(7)	Manage any adverse effects from the use, maintenance, upgrading and development of infrastructure in accordance with the policies in E15.3, recognising that it is not always practicable to locate or design infrastructure to avoid areas with indigenous biodiversity values.
E26 Infrastructure	
Policy E26.2.2(2)(a)-(c)	Provide for the development, operation, maintenance, repair, upgrade and removal of infrastructure through Auckland by recognising: (a) functional and operational needs; (b) location, route and design needs and constraints; (c) the complexity and interconnectedness of infrastructure services.
Policy E26.2.2(6)(b)	Consider the following matters where new infrastructure or major upgrades are proposed within areas that have been scheduled in the Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage and special character... ... (b) whether the infrastructure has a functional or operational need to be located in or traverse the proposed location;...

3.1 Assessment

As summarised in Part B, identified deficiencies within the southern Auckland transport network have led to the need to investigate a strategic north-south route between Manukau and Drury to supplement SH1 and Great South Road. Investigations into options to provide this strategic function have been undertaken for over two decades beginning with the 2004 Southern Sector Strategic Transport Study. Given the geography of this location, three high-level options were identified to provide this strategic function (see **Figure 3-1**):

- a) Central options – i.e. upgrading SH1;
- b) Eastern options – i.e. corridors parallel to SH1 at the eastern periphery of the urban area (the Mill Road Corridor); and
- c) Western options – i.e. corridors parallel to SH1 at the western periphery of the urban area (the Weymouth-to-Karaka corridor).

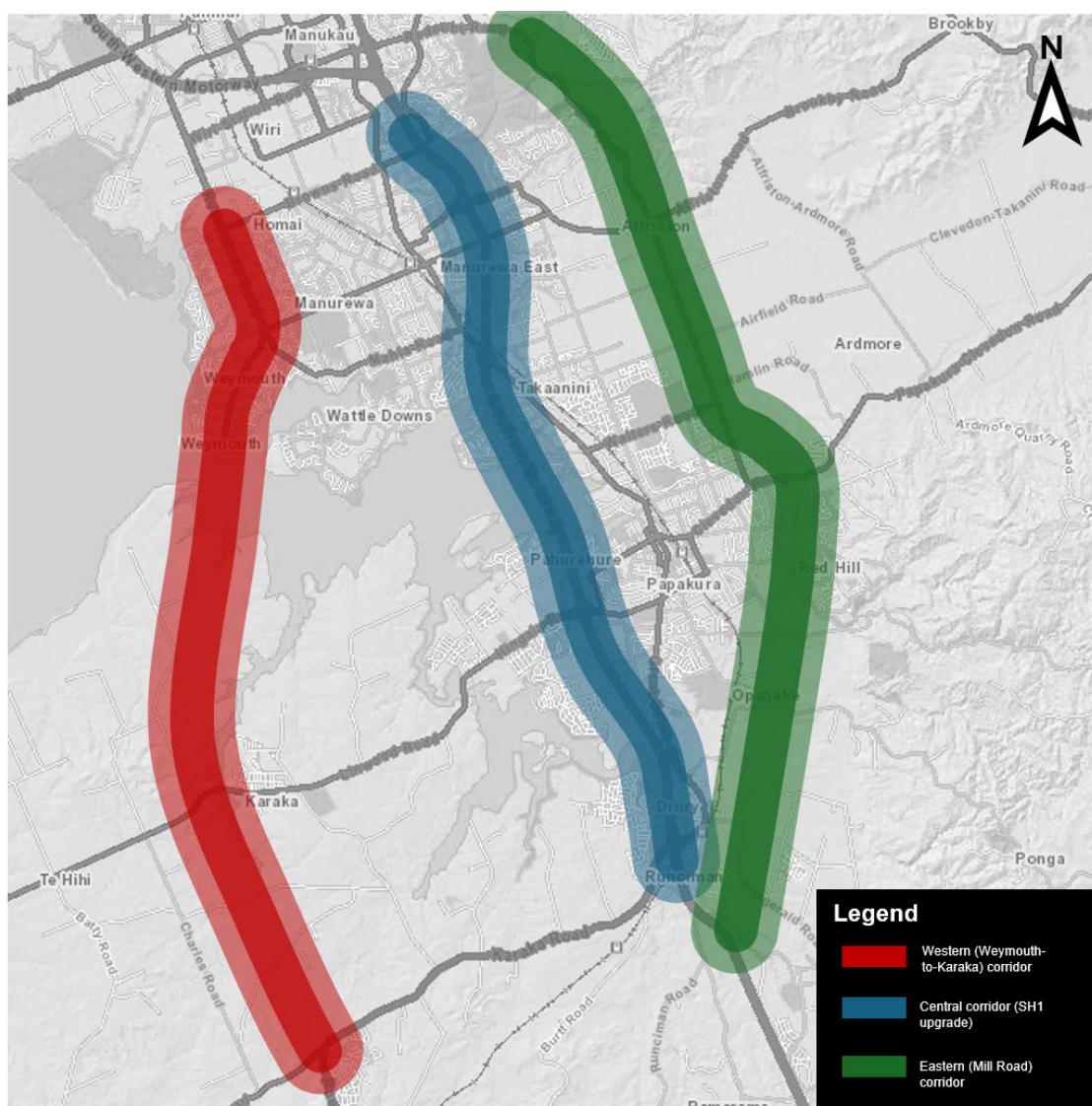


Figure 3-1 – Corridor options assessed in the Southern Sector Strategic Transport Study

The study concluded that:

- a) An upgrade of SH1 would not in itself improve the north-south resilience of the southern Auckland strategic transport network, and therefore a parallel route would be needed;

- b) Of the parallel route options, the eastern corridor was preferred on the basis that it could achieve a strategic function, whilst being closely aligned with planned growth in Alfriston, Takaanini, Papakura, Ōpāheke, and Drury;
- c) Conversely, the Weymouth-to-Karaka corridor was considered to be:
 - i) Costlier due to the need to bridge the Pahurehure Inlet; and
 - ii) Less well aligned with planned growth such that it would induce development pressure in areas not planned for urbanisation (e.g. Karaka).

This conclusion has been retested and validated on several occasions since, most recently as part of Te Tupu Ngātahi, which retested several variants of these corridors between 2018-2021.

Further studies were commissioned by legacy councils and subsequently AT to confirm a route for the initial northern section of the Corridor (now referred to as Stage 1). These underpinned the NoRs which were lodged in 2014 and confirmed as designations in 2016.

The assessment of alternatives undertaken for the 2014 NoRs and tested through Council Hearing and Environment Court Appeal processes assessed at least fifteen alignments or variations on alignments for the rural section of the corridor. More recently, the alternatives assessment process underpinning this SAR assessed several further variations on the bridge alignments through the Puhinui Gully and Cheesman's Bush. Each successive assessment concluded that there is no practicable alignment through the rural section which could achieve the Project objectives⁴ without affecting the Puhinui Gully and Cheesman's Bush features. Moreover, the generally perpendicular orientation of streams and associated wetlands to the proposed corridor is also such that the various tributaries of the Puhinui Creek and Papakura Stream are not possible to avoid (see **Figure 3-2**).

⁴ AT's Project Objectives in 2014 were to: "a) Improve transport access in the area of Manukau / Takanini / Papakura to support the growth identified in the Takanini Structure Plan area and wider southern growth area identified in the Auckland Plan; b) Improve the efficiency, resilience, and safety of the transport network between Manukau and Papakura; and c) Provide a sustainable transport solution that contributes positively to a liveable city". NZTA's updated Project Objective, as described in Part C, is to "Provide a transport corridor between the SH1 Redoubt Road Interchange and the intersection of Mill Road and Phillip Road to improve traffic efficiency and enhance network resilience".



Figure 3-2 – General optioneering extent for rural section – note perpendicular streams and SEAs

In summary, the previous studies have:

- Confirmed a functional and operational need for a new strategic north-south transport corridor within the southern transport network;
- Confirmed the functional and operational need (strategic corridor to support planned growth areas) for the corridor to be to the east of the SH1 alignment; and
- Concluded that the function and operation of the corridor can only occur within the Watercare Bush, Cheesman's Bush and impacted watercourse environments.

Therefore, there is both a functional and operational need for the proposed alignment of the Project to be located within the relevant protected environments.

An assessment of the Project's functional and operational need to traverse the protected features in question is set out in the table below.

Table 3-2 – Functional and/or Operational Need Assessment

Feature	Functional and/or Operational Need to traverse
Everglade Park SEA (SEA_T_538a)	▪ The Everglade Park SEA is located directly between an existing road within the Project extent generating runoff (Everglade Drive), and a point of stormwater discharge (a tributary of the Puhinui Creek within Everglade Park). ▪ There is a functional need to treat, attenuate and ultimate discharge stormwater runoff from the road to the receiving stream environment at Everglade Park. This will be facilitated by a new stormwater device (wetland) and associated discharge outfall. Alternative devices would not achieve the required treatment and attenuation capacity, and alternative locations would affect additional properties on Everglade Drive as suitably located land (i.e., near the receiving stream tributary) is limited. While design refinements have enabled the stormwater device to be located outside of the SEA extent, there is no practicable alternative for the outfall structure to avoid traversing the SEA extent. The outfall needs to be connected to the new treatment/attenuation device, whilst positioned near the stream/discharge environment and with sufficient erosion protection to operate effectively, however, much of the land adjacent to the stream lies within the SEA. Accordingly, a functional and operational need to affect the SEA is established. ▪ Design refinements have resulted in the discharge outlet avoiding a group of mature tōtara trees, and the only impact on vegetation is to removal of/works within the Protected Root Zone of small pioneer/self-sown indigenous vegetation. The effect on the overall SEA extent and values is negligible.
Watercare Bush / Puhinui Gully SEA (SEA_T_4570) (and associated areas with indigenous biodiversity values including native fauna)	▪ The proposed alignment for the Project is the result of optioneering which has sought to provide a strategic north-south route which utilises online sections of Redoubt Road and Mill Road, while traversing generally east of existing urbanised areas. A 3.6km section between Redoubt Road and Phillip Road was identified as requiring an offline route due to poor ground conditions and geometric limitations of the existing Mill Road alignment. ▪ Each successive alternatives assessment process concluded that there was not a practicable alignment through the rural section which could achieve the Project Objectives without affecting the Puhinui Gully and Cheesman's Bush features. Accordingly, both a functional need and operational need for the Project to traverse these features exist.
Cheesman's Bush SEA (SEA_T_9102) (and associated areas with indigenous biodiversity values including native fauna)	
Existing natural inland wetlands	▪ The proposed alignment for the Project is the result of optioneering which has sought to provide a strategic north-south route which utilises online sections of Redoubt Road and Mill Road, while traversing generally east of existing urbanised areas. A 3.6km section between Redoubt Road and Phillip Road was identified as requiring an offline route due to poor ground conditions and geometric limitations of the existing Mill Road alignment. ▪ Numerous streams and wetlands associated with the various tributaries of the Puhinui Creek and Papakura Stream are located within this 3.6km section. Given that the stream systems flow perpendicular (east-to-west) to the north-south corridor, they affect all possible options throughout the area. ▪ Based on analysis contained in the Freshwater Ecology Assessment (see Appendix C7), the Project works conservatively fall within a 100m buffer of approximately 45 natural inland wetlands. Of these, the Project works: - Will avoid direct permanent impacts to 30 wetlands;
Existing permanent and intermittent watercourses	

	- Has the potential to result in temporary discharges within or within a 100m setback of up to 45 wetlands; - Has the potential to result in temporary damming and diversion of water within or within a 100m setback of up to 7 wetlands; - Likely to result in direct permanent impacts on 15 wetlands; and - Of the 45 wetlands identified, restoration works are proposed at 5 sites; and two new constructed wetlands are also proposed. ▪ There is not a practicable alignment through the rural section which could achieve the Project Objective without affecting the streams and at least some of the associated wetlands. Accordingly, both a functional and operational need for the Project to traverse these features exists.
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Through the alternatives assessment (which has been retested on several occasions including through this SAR) and the design refinement process, the Project has established a clear functional and operational need to traverse SEAs, areas with indigenous biodiversity values, and existing natural inland wetlands and watercourses. This recognises that it has not been possible to avoid all effects on localised areas of protected natural and physical resources, and accordingly that the focus shifts to the management of effects in these instances (including the application of the effects management hierarchy where appropriate).

The Project also satisfies the regional and national benefits test included in some of the objectives and policies in **Table 3-1** for reasons set out in Part B of this SAR. Further, and as discussed in more detail below, it is considered that NZTA has taken an appropriate approach to the effects management hierarchy. Significant efforts have been made to avoid first and then minimise adverse effects. Where adverse effects remain, appropriate measures to mitigate effects will be adopted and are provided for through the proposed conditions and management plans.

Based on the above analysis, the Project is consistent with the objectives and policies set out in **Table 3-1**.

4. Consideration of alternatives where certain effects arise

The policy framework established under the NPS-I, NPS-IB, and AUP requires consideration of alternatives in relation to specific effects including on SEAs, streams and natural inland wetlands. This requirement is distinct from the broader requirement to assess alternatives in relation to the designation alteration, which is addressed in Part C to this SAR.

The relevant provisions are set out in **Table 4-1** below. At the outset it is noted that there is some overlap between the considerations under this policy theme, and policy themes 2 (effects on sensitive environments) and 4 (management of effects).

Table 4-1 – Provisions of relevance to alternatives in relation to specific effects

National Policy Statements	
NPS-I	
Policy 7	(1) When assessing and managing the effects of infrastructure activities, decision-makers must: (a) Have regard to the extent to which adverse effects have been avoided, remedied, or mitigated through the selection of the route, site, or method of undertaking the work;...
NPS-IB	
Policy 7 and Part 3, Clause 3.10-3.11	SNAs are protected by avoiding or managing adverse effects from new subdivision, use, and development. ... Part 3, Clause 3.11

	(1) Clause 3.10(2) does not apply, and any adverse effects on an SNA on a new subdivision, use, or development must be managed in accordance with 3.10(3) and (4) if: ... (c) There are no practicable alternative locations for the new subdivision, use, or development.
NPS-FM	
Policy 6 and subpart 3.22	The loss of extent of natural inland wetlands is avoided, their values are protected, and their restoration is promoted, except where: ... (c) The regional council is satisfied that: ... (v) there is either no practicable alternative location for the activity within the area of the development, or every other practicable location in the area of the development would have equal or greater adverse effects on a natural inland wetland
Auckland Unitary Plan	
D9 Significant Ecological Areas Overlay	
Policy D9.3(6)	... avoid as far as practicable the removal of vegetation and loss of biodiversity in significant ecological areas from the construction of building platforms, access ways or infrastructure, through: ... (c) assessing any practicable alternative locations and/or methods that would reduce the need for vegetation removal or land disturbance...
E3 Lakes, rivers, streams and wetlands	
Policy E3.3(13)	Avoid the reclamation and drainage of the bed of lakes, rivers, streams and wetlands, including any extension to existing reclamations or drained areas unless all of the following apply: (a) there is no practicable alternative method for undertaking the activity outside the lake, river, stream or wetland; ...
E26 Infrastructure	
Policy E26.2.2(6)(d)	Consider the following matters where new infrastructure or major upgrades to infrastructure are proposed within areas that have been scheduled in the Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage, and special character: ... (d) whether there are any practicable alternative locations, routes, or designs which would avoid, or reduce adverse effects on the values of those places...

4.1 Assessment

The Project traverses:

- a) three SEAs within which vegetation clearance is required – Everglade Park (SEA_T_538a), Puhinui Gully (SEA_T_4570), and Cheesman's Bush (SEA_T_9102); and
- b) Several streams and wetlands associated with the tributaries of Puhinui Creek and Papakura Stream.

The alternatives assessment undertaken for each of these features, specifically in relation to the requirements of the policies above, is summarised below.

4.1.1 Everglade Park SEA

A new stormwater device (attenuation and treatment wetland) and its connected stormwater outfall are proposed within Everglade Park, with the outfall located within a portion of the SEA extent.

The location of stormwater devices is operationally constrained, and the design process which guides the selection and/or location of stormwater devices is based on design criteria, functional requirements, and the surrounding land use and catchment context (see **Appendix C21** of this SAR).

Complete avoidance of the SEA at Everglade Park is not practicable for the reasons set out in Table 3-2. In particular, the outfall must be located in proximity to the stream tributary that forms the discharge environment, and the land adjacent to this tributary is predominantly within the SEA extent. Notwithstanding this, alternative discharge locations were assessed to minimise adverse effects on the SEA.

The original discharge location impacted a group of mature tōtara trees and required removal of indigenous vegetation. In response, the discharge point was shifted to the south to avoid the mature tōtara trees. Any remaining vegetation effects within the Everglade Park SEA are expected to be limited to the removal of and works within the Protected Root Zone of small pioneer/self-sown vegetation. Consequently, the effect on the overall SEA extent and values is negligible.

4.1.2 Puhinui Gully and Cheesman's Bush SEAs

The alternatives assessment in relation to the Puhinui Gully and Chessman's Bush SEAs was extensively tested through the 2014 NoR process and recent assessments, which is summarised in Part C of this SAR. In summary:

- a) The 2014 NoR considered numerous options to avoid the Puhinui Gully SEA, including an option more closely following the existing Redoubt Road-Mill Road alignment. This option was not progressed as it was geometrically constrained, impacted additional properties, and another SEA to the west of the existing road;
- b) At the Council hearing, additional options (e.g. lateral and vertical changes to the alignment) to avoid or reduce the need for clearance and topping of the trees within Cheesman's Bush were discussed. Through the hearing, it was concluded that these design options would have limited benefit in terms of avoiding effects and would potentially result in greater edge effects and ongoing maintenance requirements;
- c) The Hearing Commissioners concluded that the alternatives assessment was comprehensive and recommended confirmation of the designations; and
- d) Notwithstanding (a) and (b), through this process NZTA has taken further optioneering, design refinement, and construction methodology refinement to further reduce effects on the SEAs. These refinements are discussed in more detail in Part C of this SAR.

4.1.3 Streams and wetlands

As discussed in Section 3 above, the impact of the Project on streams and wetlands is a result of a comprehensive assessment of alternatives process which identified a functional and operational need for an offline alignment between Redoubt Road and Phillips Road. In this portion of the Project, as the stream systems flow perpendicularly to the Project alignment, all alternative options would result in some impact on streams and wetlands. Notwithstanding this, NZTA has gone to significant lengths to minimise effects on streams and wetlands through design refinement as detailed in **Appendix C7**.

4.2 Conclusion

Based on the above analysis, the Project is consistent with the objectives and policies set out in **Table 4-1**, which require consideration of alternatives in relation to effects on SEAs, wetlands and streams. The assessment documented above (and supplemented by Part C and Sections 3 and 5) of this Part clearly demonstrates that alternatives have been assessed thoroughly in relation to these effects.

5. Effects management

A range of provisions direct infrastructure to avoid where practicable adverse effects on protected natural and physical resources or otherwise minimise effects that cannot be avoided. Numerous provisions also direct infrastructure to apply an effects management hierarchy where avoidance is not practicable. This section focuses on NZTA's efforts to minimise or otherwise manage adverse effects, noting that Sections 3 and 4 demonstrate:

- a) A functional and operational need for the project alignment to be located in sensitive environments;
- b) Options which seek to avoid effects on sensitive environments have been considered and dismissed as unfeasible.

The objectives and policies relevant to this policy theme are identified in **Table 5-1** below. Consideration of the same policy theme in relation to other values and features is provided in **Appendix D1**.

Table 5-1 Provisions of relevance to the application of the effects management hierarchy

National Policy Statements	
NPS – I	
Policy 7	(1) When assessing and managing the effects of infrastructure activities, decision-makers must: (a) Have regard to the extent to which adverse effects have been avoided, remedied, or mitigated through the selection of the route, site, or method of undertaking the work; (b) Consider the technical and operational requirements and constraints of infrastructure activities; (c) Take into account the extent to which the effects of the infrastructure activities are different in scale, intensity, duration and frequency from the effects of existing infrastructure; (d) Take into account relevant international standards (that are recognised or used in New Zealand), national standards and recognised best practice standards and methodologies to assess and manage adverse effects; and (e) Ensure that the mitigation measures and consent conditions are proportionate to the scale of adverse effects generated by the activity.
Policy 9	(1) Decision-makers must enable new infrastructure or major upgrades of existing infrastructure activities in all environments. (2) Where infrastructure activities are proposed to locate in or are likely to have adverse effects on environments and values provided for in section 6 of the Act, the provisions of this policy must be read alongside other relevant national direction, regional policy statements, and regional and district plans. (3) Where (2) does not apply, the adverse effects of new infrastructure must be, where practicable, avoided, remedied, or mitigated.
NPS-IB	
Policy 7 and Part 3, Clause 3.10-3.11	SNA are protected by avoiding or managing adverse effects from new subdivision, use, and development. ... Part 3, Clause 3.10 (3) Any adverse effects on an SNA of a new subdivision, use, or development... that occur as a result of the exceptions in clause 3.11, must be managed by applying the effects management hierarchy; (4) Where adverse effects on an SNA are required to be managed pursuant to subclause (3) by applying the effects management hierarchy, an applicant must be required to demonstrate: (a) how each step of the effects management hierarchy will be applied; and (b) if biodiversity offsetting or biodiversity compensation is applied, the applicant has complied with principles 1-6 in Appendix 3 and 4 and has had regard to the remaining principles in Appendix 3 and 4, as appropriate. ... Part 3, Clause 3.11 (1) Clause 3.10(2) does not apply, and any adverse effects on an SNA on a new subdivision, use, or development must be managed in accordance with 3.10(3) and (4) if:

	(a) The new subdivision, use, or development is required for the purposes of any of the following... (i) Construction or upgrade... of specified infrastructure that provides significant national or regional benefit...
NPS:FM	
Objective 1	... to ensure that natural and physical resources are managed in a way that prioritises: (a) First, the health and wellbeing of water bodies and freshwater ecosystems; (b) Second, the health needs of people (such as drinking water); and (c) Third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.
Auckland Unitary Plan	
B3 Ngā pūnaha hanganga, kawekawe me ngā pūngao - Infrastructure, transport and energy	
Objective B3.2.1(3)(a)	Development, operation, maintenance, and upgrading of infrastructure is enabled while managing adverse effects on: (a) The quality of the environment and, in particular, natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources...
Objective B3.2.1(8)	The adverse effects of infrastructure are avoided, remedied or mitigated.
Policy B3.2.2(6)	Enable the development, operation, maintenance and upgrading of infrastructure in areas with natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage and special character while ensuring that the adverse effects on the values of such areas are avoided where practicable or otherwise remedied or mitigated.
Policy B3.2.2(8)	Avoid, remedy or mitigate the adverse effects from the construction, operation, maintenance or repair of infrastructure.
Objective B3.3.1(1)(d)	Effective, efficient and safe transport that: (d) avoids, remedies or mitigates adverse effects on the quality of the environment and amenity values and the health and safety of people and communities; and...
Policy 3.3.2(7)	Avoid, remedy or mitigate the adverse effects associated with the construction or operation of transport infrastructure on the environment and on community health and safety
Objective B3.2.1(8)	The adverse effects of infrastructure are avoided, remedied, or mitigated.
Policy B3.2.2(6)	Enable the development, operation, maintenance and upgrading of infrastructure in areas with natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources... while ensuring that the adverse effects on the values of such areas are avoided where practicable or otherwise remedied or mitigated.
Policy B3.2.2(8)	Avoid, remedy, or mitigate the adverse effects from the construction, operation, maintenance, or repair of infrastructure.
Objective B3.3.1(1)(d)	Effective, efficient, and safe transport that: ... (d) Avoids, remedies, or mitigates adverse effects on the quality of the environment and amenity values and the health and safety of people and communities.
D9 Significant Ecological Areas Overlay	
Objective D9.2(3)	The relationship of Mana Whenua and their customs and traditions with indigenous vegetation and fauna is recognised and provided for.

Policy D9.3(2)(a), (b), (g), (h), (i), (k), (m) – (o)	Adverse effects on indigenous biodiversity values in significant ecological areas that are required to be avoided, remedied, mitigated or offset may include, but are not limited to, any of the following: (n) a reduction in the historical, cultural, and spiritual association held by Mana Whenua or the wider community; (o) the destruction of, or significant reduction in, educational, scientific, amenity, historical, cultural, landscape, or natural character values; ...
Policy D9.3(7)	Provide for the role of Mana Whenua as kaitiaki in managing biodiversity, particularly in Treaty Settlement areas, and for cultural practices and cultural harvesting in significant ecological areas where the mauri of the resource is sustained.
E26 Infrastructure	
Objective E26.2.1(9)	The adverse effects of infrastructure are avoided, remedied, and mitigated.
Policy E26.2.2(3)	Avoid where practicable, or otherwise remedy or mitigate adverse effects on infrastructure from subdivision, use and development, including reverse sensitivity effects, which may compromise the operation and capacity of existing, consented and planned infrastructure.
Policy E26.2.2(4)	Require the development, operation, maintenance, repair, upgrading and removal of infrastructure to avoid, remedy or mitigate adverse effects, including, on the: (a) health, well-being and safety of people and communities, including nuisance from noise, vibration, dust and odour emissions and light spill; (b) safe and efficient operation of other infrastructure; (c) amenity values of the streetscape and adjoining properties; (d) environment from temporary and ongoing discharges; and (e) values for which a site has been scheduled or incorporated in an overlay.
Policy E26.2.2(6)(a), (g)-(h)	Consider the following matters where new infrastructure or major upgrades to infrastructure are proposed within areas that have been scheduled in the Plan in relation to natural heritage, Mana Whenua, natural resources...: ... (g) the type, scale and extent of adverse effects on the identified values of the area or feature, taking into account... (vi) the extent to which the proposed infrastructure or upgrade can avoid adverse effects on the values of the area, and where these adverse effects cannot practicably be avoided, then the extent to which adverse effects on the values of the area can be appropriately remedied or mitigated; (h) whether adverse effects on the identified values of the area or feature must be avoided pursuant to any national policy statement, national environmental standard, or regional policy statement

5.1 Assessment

Table 5-1 of Part C sets out the scale of adverse effects anticipated once mitigation is incorporated. The majority of adverse effects will be managed to an extent that in most cases, any remaining effects will be negligible to less than minor.

As noted in Part B, considerable effort has been made to avoid adverse effects through the design process, for example, through the refined bridge alignments and relocation of stormwater ponds and outfalls to avoid SEAs. Where further avoidance has been identified as not practicable, further effort has been taken to minimise adverse effects to the greatest extent practicable, for example the approach to construction of bridges within the Cheesman's Bush and Puhinui Gully SEAs. Any remaining potential effects will be managed through a combination of measures already incorporated into the Project design, a comprehensive suite of management plans and a focused set of conditions that reflects the implementation-ready nature of the Project. The management plans included as part of this application have been prepared by appropriate Suitably Qualified Persons (**SQP**) and developed alongside the Project design and technical assessments. As a result, they contain detailed methods, procedures, monitoring requirements and mitigation measures

(where relevant) that will be implemented during construction or operation to avoid, remedy or mitigate adverse effects.

With respect to effects on cultural values, Mana Whenua have expressed the view that the loss of ancient raakau will have a significant and irreversible effect on cultural values for iwi who have associations with this area and that mitigation can only reduce, not eliminate the effects. Where removal cannot be avoided, Mana Whenua seek mitigation to include (as a minimum):

- a) Seed collection and propagation to continue the whakapapa of ancestral raakau;
- b) The opportunity to repurpose ancient raakau for cultural use and cultural expression (e.g. carving);
- c) The opportunity to supply plants and pest management services, with Mana Whenua involvement in determining appropriate approaches; and
- d) Cultural and customary access to Cheesman's Bush and Puhinui Gully to reconnect with their traditional tribal rohe (following years of cultural disconnection).

NZTA have worked closely with Mana Whenua to avoid and then minimise the loss of Significant Trees through the design process. As a result of these efforts the number of Significant Trees anticipated to be impacted by the Project has reduced from 156 to 65, of which the number of Significant Trees anticipated to be removed by the Project has reduced from (potentially) 156 to 14. As such, it is considered that significant efforts to avoid and minimise adverse effects associated with the loss of Significant Trees have been undertaken. In addition:

- a) Seed collection protocols are set out in the TMP;
- b) The process for and commitment to repurposing of ancient raakau that will be removed by the Project is set out in the OGTPM;
- c) Condition 3 requires NZTA to establish a Mana Whenua Kaitiaki Forum at least six months prior to the start of detailed design. The purpose of the Mana Whenua Kaitiaki Forum is to enable Mana Whenua to participate in detailed design to identify opportunities for incorporating Mana Whenua cultural values into the Project; and
- d) Condition 4 requires the preparation of a CMP in collaboration with Mana Whenua prior to the start of construction. The objective of the CMP is to recognise Mana Whenua values in the area affected by the Project's construction and to outline management measures designed to avoid or minimise effects on cultural values. To achieve this objective, the CMP shall set out (amongst other things):
 - i) The tikanga and cultural protocols to be undertaken in relation to the removal of ancestral rākau/ culturally significant trees, including but not limited to, karakia (traditional incantations), poroporoaki (cultural farewell), cultural monitoring and induction;
 - ii) The role and function of Kaitiaki and cultural monitors;
 - iii) Activities, sites and areas where cultural monitoring is required during construction works and what the cultural monitoring will comprise; and
 - iv) The number of personnel who will undertake cultural monitoring.

Having regard to the above, it is considered that overall, the adverse effects of the Project will be managed in a manner consistent with the relevant policy framework. It is recognised that the Project will result in significant unavoidable adverse effects resulting from the removal of Significant Trees however, it is considered that NZTA have undertaken appropriate measures to avoid and minimise those effects and have committed to undertake further measures to reduce these effects through future phases of the Project.

6. Sections 5, 6, and 7 of the RMA

As required by Schedule 5, Clause 5(1)(g) and 12(1)(d)(i), an assessment of the Project against sections 5, 6, and 7 of the RMA is provided below. To reach a conclusion on whether the Project achieves the purpose of the RMA, the assessment first addresses sections 6 and 7 before addressing section 5.

6.1 Section 6 – Matters of national importance

Section 6 of the RMA sets out the matters of national importance that are to be recognised and provided for in achieving the purpose of the Act under section 5. An assessment of the section 6 matters of relevance to the Project is provided below in **Table 6-1**.

Table 6-1 – Section 6 assessment

Matter of national importance		Assessment
(a)	Recognise and provide for the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development	The Project is not located within the coastal environment or coastal marine area and does not affect lakes. However, it does traverse multiple rivers/streams (the Puhinui Creek and tributaries of the Papakura Stream), as well as associated wetlands. As noted above in Section 3, the Project has a functional and operational need to be in this location and is a RoNS. Therefore, the Project is not 'inappropriate' development. Overall, it is considered that the Project appropriately recognises and provides for the preservation of the natural character of wetlands, rivers and their margins, and protects them from inappropriate subdivision, use, and development.
(b)	Recognise and provide for the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development	There are no outstanding natural features and landscapes impacted by the Project or located within the Project extent.
(c)	Recognise and provide for the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna	As discussed above, significant efforts have been undertaken to avoid and minimise effects on the values of the SEAs. Where effects are unavoidable, the Project has incorporated measures to mitigate, offset, and compensate for those effects. Overall, it is considered that the Project recognises and provides for the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna.
(d)	Recognise and provide for the maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers	The Project extent is not within the coastal marine area and does not contain any lakes. The Project traverses multiple streams including Puhinui Creek which is publicly accessible in some locations via established walking tracks. The current level of public access afforded to the stream will not be impacted by the Project.
(e)	Recognise and provide for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga	Mana Whenua have been involved as partners throughout the development of the Project as documented in Part B of this SAR. Advice received through this engagement process (especially as it relates to the cultural landscape and old growth trees) has informed further design refinements as documented in Parts B and C of this SAR. Ongoing engagement with Mana Whenua will support continued involvement as kaitiaki and partners through implementation of the Project. This will be facilitated through a Mana Whenua Kaitiaki Forum which is required to be established at least six months prior to the start of detailed design for each stage of work as required by the proposed conditions in Part G. With the exception of a small area of the St Johns Redoubt (which is within the Te Ākitai Waiohū statutory acknowledgement area), the Project is not known to contain Māori land, or documented sites of significance to Mana Whenua identified in the AUP. Through discussions with Te Ākitai Waiohū, the design of the Project at the

Matter of national importance		Assessment
		frontage of St Johns Redoubt has been revised so that there is no permanent acquisition of the land subject to the statutory acknowledgement area. However, temporary occupation will be required to re-grade the existing vehicle access to the site. Overall, it is considered that the Project recognises and provides for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga.
(f)	Recognise and provide for the protection of historic heritage from inappropriate subdivision, use, and development	The Project directly affects the Alfriston Meeting House (R11/2074) which is a listed NZAA archaeological site. This building will either be demolished, with recording undertaken as per HNZPT Archaeological Guidelines Series No.1: Investigation and Recording of Buildings and Standing Structures (November 2018) ('HNZPT AGS1 guidelines') or relocated to an alternative site if practicable and if a third party (new owner) can be identified who is willing to accept the building in its current condition and undertake any necessary renovation or remedial works to enable its adaptive reuse. This will be undertaken following the protocols set out in the HHMP in Appendix C20. Other subsurface features associated with the Alfriston Meeting House and Alfriston Post Office (R11/2069) sites, as well as potential previously unrecorded archaeological sites that could be encountered within the Project works, can also be appropriately managed through the HHMP. Overall, it is considered that the Project appropriately recognises and provides for the protection of historic heritage from inappropriate subdivision, use, and development.
(g)	Recognise and provide for the protection of protected customary rights	There are no known protected customary rights impacted by the Project.
(h)	Recognise and provide for the management of significant risks from natural hazards.	Risks from natural hazards such as flooding and land instability have been managed to an appropriate level through design (see Appendix H1) and the proposed conditions (Part G of this SAR).

6.2 Section 7 – Other matters

Section 7 of the RMA sets out other matters that all persons shall have particular regard to in achieving the purpose of the Act under section 5. An assessment of the section 7 matters of relevance to the Project is provided below in **Table 6-2**.

Table 6-2 – Section 7 assessment

Other matter		Assessment
(a) (aa)	Kaitiakitanga and the ethic of stewardship	The Project has sought to have regard to kaitiakitanga through engagement with Mana Whenua. Mana Whenua have been involved as partners throughout the development of the Project as documented in Part B of this SAR. The advice from this engagement process (especially as it relates to the cultural landscape and Significant Trees) has informed further design refinements as documented in Parts B and C.
(b)	The efficient use and development of natural and physical resources	The Project represents an efficient use and development of physical resources. It will provide new and upgraded state highway infrastructure within a corridor identified through a long-term strategic planning and business case process. The Project will improve the efficiency, safety, reliability and resilience of the transport network, while supporting planned urban growth and the movement of people and freight.

(c)	The maintenance and enhancement of amenity values	The Project will be carried out in general accordance with the ULDMP (Appendix C14). This sets out how the Project will effectively integrate into the surrounding urban and landscape character, therefore, maintain and enhance amenity values in Project's operational phase.
(d)	Intrinsic values of ecosystems	The Project has sought to avoid adverse effects on ecosystems as far as practicable through design, and where effects have been unavoidable the Project has incorporated significant measures to mitigate, offset, and compensate for those effects where possible. While mitigation for freshwater/wetland ecological effects will result in net gain outcomes, there will be significant residual effects on mature terrestrial ecology that cannot be fully mitigated, offset, or compensated.
(f)	Maintenance and enhancement of the quality of the environment	The Project has sought to maintain and enhance the quality of the environment. Management plans provided with this SAR, including the FMP (Appendix C8), TMP (Appendix C5) and ULDMP (Appendix C14) have demonstrated how this will be achieved in further detail.
(g)	Any finite characteristics of natural and physical resources	The Project will result in the removal of WF9 and VF5 forest and associated Significant Trees which cannot be replaced in the short to medium term. As set out above, these adverse effects are considered to be largely unavoidable and significant efforts to avoid minimise and otherwise mitigate these effects have been undertaken. The proposed effects management package is ecologically appropriate and proportionate to the residual effects and delivers a positive modelled outcome for the affected terrestrial ecosystems. The Project will also result in stream and wetland habitat loss, the overall freshwater mitigation package will result in a net gain of stream and wetland ecological values. The Project is acknowledged to intercept groundwater, in highly localised areas where large cuts are required within the Project extent. The Assessment of Groundwater Effects (Appendix C22) concludes that there will be a negligible to very low risk of groundwater drawdown effects. Overall, it is considered that particular regard to the finite characteristics of natural and physical resources has been undertaken.
(i)	The effects of climate change; and	The Project will increase the resilience and capacity of the transport network with an additional north-south route which is resilient to the effects of climate change.

6.3 Section 5 – Purpose

Section 5 sets out the purpose of the RMA being to promote the sustainable management of natural and physical resources as defined in section 5(2).

The Project has the potential to result in adverse effects associated with land disturbance, freshwater environments, wetlands, ecology, landscape, noise, construction activities, archaeology, cultural values, stormwater and flooding. These effects have been assessed in the technical reports supporting this SAR and in Part C. The Project has been developed to avoid adverse effects where practicable, and where avoidance is not practicable, to remedy, mitigate, offset or compensate for those effects. Overall, the majority of residual adverse effects (except for those relating to cultural effects) can be managed to be negligible to no more than minor. The Project is therefore consistent with section 5(2) of the RMA in that it requires management of adverse effects on the environment whilst undertaking activities which enable people and communities to provide for their social, economic and environmental wellbeing.

In respect of effects on cultural values, the Project has exhausted all practicable means to avoid and minimise adverse effects through the alternatives assessment, design refinement, construction methodology, and proposed conditions. A substantial offset and compensation package is proposed that will result in a positive modelled outcome for the affected terrestrial ecosystems. NZTA acknowledges that Mana Whenua consider that there are significant adverse effects on cultural values associated with the loss of ancient

raakau that cannot be fully mitigated, offset, or compensated for. NZTA has sought to address these concerns via the cultural mitigation package proposed.

Overall, it is concluded that the Project is consistent with the purpose of the RMA as it will enable people and communities to provide for their social economic, cultural and environmental wellbeing, and for their health and safety through increasing the traffic efficiency and safety of the corridor and enhancing the wider transport network resilience of Southern Auckland.

APPENDIX D1 TABLE OF RELEVANT PROVISIONS

Plan / Policy Document	Key Objectives and Policies	Summary and Assessment
Enabling Infrastructure while managing its adverse effects		
NPS-I	Objective 1 Policies 1, 7, 9	Summary of relevant objectives and policies - The objectives and policies in the NPS-I, and Chapters B3 and E26 of the AUP recognise the essential role that infrastructure has in enabling social, economic, cultural, and environmental well-being. The provisions recognise the importance of transport infrastructure in the movement of people, goods, and services, in realising a quality compact urban form, and in enabling growth. Accordingly, the provisions anticipate and enable the planning, construction, operation, and maintenance of transport infrastructure. - As well as enabling infrastructure in general terms, the objectives and policies in these chapters specifically seek to enable infrastructure networks that are safe, resilient, effective, and efficient. The provisions also identify specifically the value of investment in existing infrastructure, and the need to provide for the development and upgrade of both existing and future transport infrastructure routes. - In enabling infrastructure, these provisions (along with the objectives and policies in Chapters E12 and E25) also anticipate that the construction, operation, and maintenance of infrastructure can have a range of adverse environmental effects which should be avoided, remedied, or mitigated. The objectives and policies further recognise that infrastructure can have a functional and operational needs to locate in particular environments, including areas of identified value relating to natural heritage, natural resources, Mana Whenua, the coastal environment, historic heritage, and special character. Accordingly, the AUP directs that the effects of infrastructure are to be assessed in the context of the wider need for and benefits of the infrastructure proposed. - Policy 9 of the NPS-I requires infrastructure to be enabled in all environments but requires that the enabling directive is read in conjunction with other relevant policy frameworks where infrastructure affects environments and values provided for in section 6 of the RMA. Assessment - As noted in Part B and C of the SAR, the Project addresses a range of identified existing transport deficiencies in the southern Auckland transport network. The existing Redoubt Road and Mill Road Corridor experiences significant and worsening congestion and has a poor safety record with various crashes and injuries. More generally, the southern Auckland transport network is vulnerable to disruptions caused by traffic incidents due to an over-reliance on SH1 as a north-south corridor and a lack of alternative routes. Without intervention, these deficiencies will be exacerbated by planned growth. - The Project will directly address these transport deficiencies. Under a 2031 assessment timeframe, the Project is predicted to result in improved traffic efficiency including a 25% reduction in peak travel times along the corridor, a 30% reduction in congested travel, and improved journey time reliability and corridor productivity. The Project will also result in a more resilient transport network by introducing a viable alternative to SH1 as a north-south route; and is also expected to significantly improve the corridor's safety record (>50% reduction in deaths and serious injuries). These benefits are also critical in serving both recent and planned population growth in the wider area. For these reasons, the Project has been identified as a RoNS in the GPS where it is cited as an essential corridor that “will reduce congestion, improve safety, support housing development... boost economic growth, and provide a more resilient roading network”. Moreover, the Project is identified in Auckland’s FDS as a bulk infrastructure prerequisite to support planned growth. - Given the above benefits, the Project clearly responds to and is consistent with the objectives and policies in Chapters B3 and E26 which promote and enable the provision and upgrade of infrastructure on the basis that it enables social, economic, cultural, and environmental wellbeing; and accordingly provides significant public benefit and serves the public interest. - As documented in Parts C and D of the SAR, the design and optioneering undertaken for the Project has in the first instance sought to avoid areas and features of value including those relating (relevantly) to natural resources, Mana Whenua, and historic heritage. This includes through assessment and the design process undertaken to support the NoRs for the Project as lodged in 2014 and confirmed as designations in 2016; and the more recent work undertaken to support this SAR. Through these processes, a functional and operational need for the location and extent of the proposed infrastructure has been established where full avoidance has not been possible – most notably where the Project corridor traverses the SEAs associated with Puhinui Gully and Cheesman’s Bush (SEA_T_4570; and SEA_T_9102) and freshwater features such as wetlands and streams. The Project’s direct physical impacts on features protected by overlays or provisions of the AUP are limited to those necessary and substantiated by a functional and operational need; and are proposed to be subject to a suite of management measures. - The acoustic effects assessment submitted with the SAR identifies the effects of the Project in terms of construction and operational noise and vibration and proposes suitable management and mitigation of these effects. This includes the CNVMP which addresses the relevant requirements of the conditions that were placed on the designations in 2016 to manage construction effects. Where the original designation conditions are no longer considered appropriate or relevant, this is assessed in the Assessment of Construction Noise and Vibration Effects (Appendix C15). Specific noise mitigation requirements (e.g., noise barriers) and a process for investigating building modification mitigation at identified Category C properties are also incorporated into the proposed conditions (see Appendix G1) to manage operational noise effects. Accordingly, the Project is consistent with the relevant identified objectives and policies under Chapter E25 of the AUP. - The Project includes a full suite of management plans to manage the potential construction-related effects, including the CNVMP, CTMP, DMP and ESCP. The ESCP submitted with this SAR is also supported by a consent condition requiring the preparation of site-specific ESCPs. In addition, consent conditions are proposed to manage and mitigate effects of construction activities in and adjacent to watercourses, SEAs and riparian areas. Given the above, the Project is consistent with the objectives and policies which require the avoidance, remediation, and mitigation of the effects of infrastructure; noting that the provisions direct that the adverse effects are to be assessed in the context of the wider need for and benefits of the infrastructure proposed.
AUP (RPS)	B3.2.1(1), B3.2.1(2), B3.2.1(3), B3.2.1(4), B3.2.1(5), B3.2.1(8) B3.2.2(1), B3.2.2(2), B3.2.2(3), B3.2.2(4), B3.2.2(5), B3.2.2(6), B3.2.2(8) B3.3.1(1), B3.3.2(1), B3.3.2(2), B3.3.2(3), B3.3.2(6), B3.3.2(7)	
AUP (RP/DP)	E12.2(1), E12.3(1), E12.3(3), E12.3(4), E12.3(5), E12.3(6) E25.2(1), E25.2(4), E25.3(2), E25.3(11) E26.2.1(1), E26.2.1(2), E26.2.1(3), E26.2.1(4), E26.2.1(5), E26.2.1(9) E26.2.2(1), E26.2.2(4), E26.2.2(5), E26.2.2(6), E26.2.2(7); E26.2.2(14), E26.2.2(15)	
Urban growth and urban form		
NPS:UD	Objectives 1, 2, 3, 4, 6, 8 Policies 1, 2, 5, 6, 9, 10	Summary of relevant objectives and policies - The NPS:UD, and the objectives and policies in Chapters B2 and B3 of the RPS in the AUP, seek to provide for well-functioning urban environments, and enable all people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety. Within the NPS-UD, Auckland is recognised as a Tier 1 urban environment and is therefore subject to a greater level of policy direction in terms of intensification and density of urban form. This umbrella term encompasses a range of considerations including the need to plan/provide for sufficient development capacity to meet growth demands, the need to promote safe multi-modal accessibility in urban areas, the need to integrate urban development with infrastructure planning and funding decisions, and the need for urban environments to be conducive to reductions in greenhouse gas emissions. - The policy directives on urban development capacity established by the NPS-UD and RPS in turn are provided for through Auckland Council’s FDS which sets the spatial strategy for urban growth and infrastructure provision; and Plan Change 120 which seeks to rezone land to enable sufficient development capacity while managing natural hazard risks to development. Significant intensification has been provided for in and around Manukau as a growth node, and there will be significant provision for future urbanisation of peri-urban areas across Southern Auckland such as Drury. The FDS also signals an intent to remove some areas previously identified as future urban due to natural hazard risks including parts of eastern Takaanini and Ōpāheke.
NPS-I	Objective 1 Policies 1, 3	
AUP (RPS)	B2.2.1(1), B2.2.1(2), B2.2.1(3), B2.2.1(4), B2.2.1(5) B2.2.2(1), B2.2.1(2), B2.2.1(4), B2.2.1(5), B2.2.1(6), B2.2.1(7) B2.3.1(1), B2.3.1(2), B2.3.1(3), B3.2.1(4)	

Plan / Policy Document	Key Objectives and Policies	Summary and Assessment
AUP (RP/DP)	E26.2.1(1), E26.2.1(2), E26.2.1(3), E26.2.1(4), E26.2.1(9) E26.2.2(5), E26.2.2(6), E26.2.2(15) E27.2(1), E27.2(2), E27.2(5)	- Objectives and policies in Chapters E26 and E27 further seek to ensure that land use and all modes of transport are integrated in a manner that realises the benefits of an integrated network and manages the adverse effects of traffic generation. - Provisions in Chapters B2 and E26 both direct that infrastructure should avoid, remedy, and mitigate its adverse effects on the amenity values of properties adjoining the infrastructure. Notwithstanding this, other provisions in the same chapters anticipate the adverse effects of infrastructure, and direct that these effects are assessed in the context of the wider need for and benefits of the proposed infrastructure. Assessment - The Project is consistent with the NPS-UD and RPS objectives and policies as it provides necessary transport infrastructure to support development capacity and a well-functioning urban environment in southern Auckland. The Project addresses a range of existing transport network issues which are contrary to a well-functioning urban environment – namely congestion, a poor safety record, and a lack of network resilience. - The Project is an essential part of the transport network required to serve the transport demands of recent urbanisation (for example in Flat Bush) and the planned intensification of Manukau as signaled by the FDS and Plan Change 120. Moreover, as part of the wider Mill Road Corridor which will ultimately traverse the 21.5km between Manukau and Drury, the Project forms part of the network needed to serve of longer-term future urbanisation as signaled by the FDS in areas such as Drury. For this reason, the Project has been identified as a RoNS in the GPS where it is described as an essential corridor that “will reduce congestion, improve safety, support housing development... boost economic growth, and provide a more resilient roading network”; and in Auckland’s FDS as a bulk infrastructure prerequisite to support planned growth. - While not a primary objective, the Project plays a role in realising a multi-modal transport network – both through the provision of bus priority and shared use paths in the urban sections of the Project; and by diverting general traffic from parallel north-south routes within the urban area such as Great South Road and Porchester Road which enables those routes to better fulfil their intended multi-modal purpose for public transport and active modes (as envisaged by AT’s South Frequent Transit Network project which has recently been designated). The improved traffic efficiency as a result of the Project will also assist freight reliability, noting that freight accounts for approximately 11% of the total volumes on the existing Mill Road corridor. - The provisions of Chapters B2 and E26 of the AUP anticipate the adverse effects of infrastructure, and direct that these effects are assessed in the context of the wider need for and benefits of the proposed infrastructure. - Given the above, the Project is consistent with the objectives and policies related to urban growth and urban form; and more broadly the realisation of a well-functioning urban environment in Southern Auckland.
Ecology and natural resources		
NPS-FM	Objective 1 Policy 1, Policy 2, Policy 6, Policy 7, Policy 15	Summary of relevant objectives and policies - From a freshwater ecology perspective: - The objectives and policies of the NPS-FM broadly seek that freshwater is managed in a manner which prioritises the health of water bodies, followed by the health needs of people, and then the ability of people and communities to provide for their social, economic, and cultural well-being now and in the future. In particular, the NPS-FM seeks to protect natural wetlands, rivers, outstanding waterbodies and habitats of indigenous freshwater species. The provisions of Chapter B7 of the AUP further seek to protect and enhance ecological values in freshwater environments, in particular that degraded freshwater systems are enhanced, the loss of freshwater systems is minimised, that adverse effects of land use changes on freshwater are avoided, remedied, and mitigated; and that freshwater quality is progressively improved in degraded areas, unless, amongst other matters, it is necessary to provide for infrastructure and no practicable alternative exists. - The NPS-FM policy direction is also reflected in Chapter E1 of the AUP which contains a number of objectives and policies on integrated stormwater management system design and managing impacts on freshwater quality and flows. In turn, the objectives and policies of Chapter E3 seek to limit structures within or discharges to; lakes, rivers, and streams to those which have a functional need or operational requirement to be located there and where there is no practicable alternative; and require that any significant residual effects which cannot be avoided, remedied, or mitigated are offset in line with the effects management hierarchy. - From a terrestrial ecology perspective: - The NPS-IB provides direction on the management of indigenous biodiversity with the objective of maintaining indigenous biodiversity to achieve no overall loss in indigenous biodiversity and accordingly sets policies which seek the avoidance or management of effects on SNAs, requirement for adherence to an effects management hierarchy; and the recognition and provision for indigenous biodiversity outside SNAs. Puhinui Gully (SEA_T_4570), Cheesman’s Bush (SEA_T_9102) and Everglade Park (SEA_T_538a) are SNAs. Adverse effects on indigenous biodiversity outside SNAs must also be managed to give effect to the objectives and policies. - The identification of areas as SEAs is the primary method for biodiversity protection under the AUP. The objectives and policies of Chapters B7 and E15 of the AUP similarly seek to protect, maintain, and enhance areas of significant indigenous biodiversity from the effects of use and development. The policies of Chapter E15 further recognise that it is not always practicable to locate or design infrastructure to avoid areas containing indigenous biodiversity values where a functional or operational need for the infrastructure has been established. - The objectives and policies of the AUP recognise the benefits of infrastructure and seek to provide for its safe, efficient and effective development, operation and maintenance. In doing so, they also recognise that infrastructure can result in adverse effects, particularly where there is a functional or operational need for infrastructure to locate in certain environments and there is no practicable alternative. The provisions therefore anticipate that such effects may occur, provided they are appropriately avoided, remedied or mitigated and considered in the context of the wider benefits of the infrastructure. - In respect of highly productive land, the NPS-HPL seeks to ensure that highly productive land is protected for use in land-based primary production; but also recognises that there are situations where it is appropriate for use and development to occur on highly productive land. Assessment - The Project constitutes the construction of ‘specified infrastructure’ which will provide significant benefits as described Part B and in Section 2. - The assessment in Section 3 of Part D of this SAR demonstrates the functional and operational need for the Project to be located within and proximate to identified natural areas within indigenous biodiversity and freshwater values, including SEAs, streams and wetlands. More broadly, the Project has been subject to extensive strategic and local-scale optioneering, route selection and design refinement processes over more than two decades. These processes have sought to avoid adverse effects on identified environmental values where practicable and, where avoidance has not been practicable, to minimise effects through design refinement and adoption of appropriate management measures. - From a freshwater ecology perspective: - As outlined above, extensive alternatives assessments and design refinements have sought to avoid effects on streams and wetlands in the first instance where practicable. However, the tributaries of Puhinui Creek and Papakura Stream, together with their associated wetlands, are distributed throughout the Project area and vicinity (particularly in the rural section) and generally extend perpendicular to the proposed north-south corridor. As a result, no practicable alternative route or design has been identified that could achieve the Project objectives while avoiding all stream and wetland interactions.
NPS-IB	Objective 1 Policy 6, Policy 7, Policy 8	
NPS-HPL	Objective 1 Policy 1, Policy 8, and Policy 9	
AUP (RPS)	B7.2.1(1), B7.2.1(2), B7.2.2(5), B7.3.1(1), B7.3.1(2), B7.3.1(3) B7.3.2(1), B7.3.2(2), B7.3.2(3), B7.3.2(5), B7.3.2(6) B7.4.1(4), B7.4.2(1), B7.4.2(7)	
AUP (RP/DP)	D9.2(1), D9.2(2), D9.2(3) D9.3(1), D9.3(2), D9.3(3), D9.3(4), D9.3(6), D9.3(8) D13.2(1), D13.3(2). E1.2(1), E1.2.(2), E1.2(3), E1.3(8), E1.3(9), E1.3(10), E1.3(11), E1.3(12), E1.3(13), E1.3(14) E3.2(1), E3.2(2), E3.2(3), E3.2(4), E3.2(5), E3.2(6). E3.2(7). E3.3(1), E3.3(2), E3.3(3), E3.3(4), E3.3(5), E3.3(6), E3.3(8), E3.3(13), E3.3(15), E3.3(16), E3.3(17) E8.2 and E8.3 (refers to E1 and E2) E9.2 and E9.3 (refers to E1) E10.2(1), E10.3(1), E10.3(2), E10.3(3) E15.2(2), E15.3(7) E16.2(1), E16.2(2), E16.3(1), E16.3(2), E16.3(3) E17.2(1), E17.2(2), E17.2(3), E17.3(1), E17.3(3), E17.3(4)	

Plan / Policy Document	Key Objectives and Policies	Summary and Assessment
		- The Project design has however been refined to reduce freshwater effects where practicable, taking account of engineering constraints, hydrological function and ecological values. This includes avoiding direct permanent impacts to a substantial proportion of identified natural inland wetlands, together with refinements to bridge, culvert and stream diversion designs. - Whilst potential residual effects remain following these avoidance and minimisation efforts, the Project proposes a comprehensive package of mitigation (including offset and compensation measures) to address effects on freshwater ecological values. These include implementation of a FMP, NFCRP and ESCP, provision for fish passage where upstream habitat is present, and an offset and compensation package comprising 818m of stream restoration and 0.956ha of wetland restoration, including 0.05ha of new wetland habitat. Collectively, these measures will result in a net increase in stream length of 178m and an approximately 11.6% gain in wetland ecological value, exceeding that required to achieve a no net loss outcome (refer to Part C). - Multiple stormwater devices are also proposed across the Project to treat and/or manage stormwater flows before being discharged to the receiving environment (which includes tributaries of the Puhinui Creek and Papakura Stream). Runoff from all new impervious areas, together with existing impervious areas in the urban section of the Project, will be treated. As noted in Part B of the SAR, water quality improvements are anticipated through the provision of stormwater treatment in areas where little or no treatment currently exists. Treatment exceeding Council minimum standards is also achieved where devices exceed minimum sizing or operate in a treatment train - Erosion protection structures are proposed as part of new stormwater outfalls and culvert outlets to manage stream bed and bank erosion and maintain channel stability. - During construction, appropriate construction methodologies, staging and implementation of the ESCP will manage sediment generation and the quality and flow of potential discharges to freshwater environments. - Accordingly, the Project demonstrates that there is no practicable alternative to the proposed stream and wetland works, adverse effects have been avoided and minimised where practicable, and the effects management hierarchy has been appropriately applied to manage residual effects. On that basis, the Project is considered to be consistent with the freshwater objectives and policies of the NPS-FM and AUP relevant to the construction of specified infrastructure in this context. ▪ From a terrestrial ecology perspective: - As outlined above, numerous alternatives assessments undertaken for the Project have identified a locational need for the alignment north-east of the existing Redoubt Road/Mill Road corridor, including the need for an offline section between Redoubt Road and Ranfurly Road in the rural section. These processes demonstrated that avoidance of all areas of natural terrestrial features, areas of high indigenous biodiversity values, and significant terrestrial vegetation areas was not feasible or practicable due to design constraints, constructability, and the prohibitive cost of alternatives. The SEAs applying to the bush-clad gullies at the Puhinui Gully and Cheesman's Bush (SEA_T_4570 and SEA_T_9102) cannot be completely avoided. - The 2014-16 assessments noted that avoidance of the SEAs had been achieved to the extent practicable. Further design work as part of this phase of the Project has sought to further reduce the effects of the Project on the two SEAs through design refinements to both the Puhinui Gully bridge and the Cheesman's Bush bridge. As noted in Parts B and C of the SAR, these refinements have included an eastward shift of the horizontal alignment, an additional span, and stream diversion at the Puhinui Gully bridge; and a decrease of the Cheesman's Bush bridge cross section and increase in its span from 40 to 50m to reduce the extent of embankments affecting mature native trees. The proposed construction method has also reduced the effects on the SEAs compared to what was anticipated under the existing designation. - Whilst these measures reduce the severity of effects, it is acknowledged that they will not avoid all adverse effects and that the loss of mature WF9 and associated Significant Trees is irreplaceable in the short to medium term. Notwithstanding this, the Terrestrial Ecology Assessment concludes that the proposed effects management package is ecologically appropriate and proportionate to residual effects. The effects management package proposed by NZTA applies across approximately 27.7 hectares and includes native restoration planting between the existing SEAs at Puhinui Gully and Cheesman's Bush, enrichment planting and pest animal control within the existing Puhinui Gully and Cheesman's Bush SEAs, as well as pest plant control over a 10-year period within all restoration and enrichment planting areas. - Some of the native restoration planting areas will also have specific lizard habitat components (refer to Part C) These measures are supported through a suite of management plans including the TMP and planting plans included in the ULDMP. - Accordingly, while complete avoidance of effects on SEAs and associated indigenous biodiversity values is not practicable, the Project has demonstrated a functional and operational need for these effects, minimised vegetation loss to the greatest extent reasonably practicable through design refinement and adopted mitigation and restoration measures. The compensation package proposed will deliver a positive benefit of 36.6% in ecological values. In that context, the Project is considered to be consistent with the relevant policy framework relating to terrestrial ecological effects. ▪ Regarding highly productive land, only a small portion of the Project in the rural section traverses areas identified as highly productive land in the AUP according to the transitional definition provided in the NPS-HPL. These areas are limited to a short section south of Cheesman's Bush, and a short section of site frontages along the existing Mill Road to the south of Alfriston Road. The NPS-HPL recognises that there may be situations where it is appropriate for use and development to occur on highly productive land, and the Project meets the definition of an exemption under Clause 3.9(2) of the NPS-HPL as the land is required in relation to a designation or NoR under the RMA. The Project is also associated with specified infrastructure which is also subject to a carve-out under the NPS; and a functional and operational need for the Project has been established. The parts of the Project affecting highly productive land are not expected to significantly reduce or fragment highly productive land as the Project largely follows the existing road corridor. Accordingly, the Project is consistent with the policy directives of the NPS-HPL.
NES-FW		▪ The NES-FW regulates activities that pose risks to the health of freshwater and freshwater ecosystems and give effect to the NPS-FM. The Project will require earthworks, vegetation removal and the diversion of water within or within proximity of natural wetlands, as well as the construction of culverts within stream beds. The regulations of relevance to these aspects of the proposal include those designed to protect natural inland wetlands, protect urban and rural streams from in-filling, and to ensure connectivity of fish habitat (fish passage). ▪ The Project is for the purpose of the construction of 'specified infrastructure' that will provide significant national and regional benefits. The Project has a functional need to be constructed in the proposed location proximate to natural wetlands and streams, and the actual and potential adverse effects on the natural wetlands and streams will be appropriately addressed in accordance with the effects management hierarchy. As such the Project is considered to be consistent with the specific NES-FW provisions relating to the construction of specified infrastructure. Further, the proposed culverts have been designed and will be constructed to provide for appropriate fish passage (where upstream fish habitat has been identified).
Natural hazards (Flooding, Land Instability) and environmental risk (Air Quality, Contaminated Land)		
NPS-UD	Objective 8; Policy 1(f)	Summary of relevant objectives and policies ▪ Chapter B3 of the AUP directs that infrastructure with a functional or operational need to locate in a natural hazard area should ensure that its location and design minimise risk from natural hazards including flooding and land instability; and that risks that cannot be avoided by location or design should be mitigated to the extent practicable. Similarly, the provisions of Chapters B10, E26, and E36 require that the risks to infrastructure from natural hazards are not increased; and to this end that planning applications for infrastructure projects adequately assess natural hazards risks and minimise risk through location and design. Moreover, the NPS-UD policy framework requires that well-functioning urban environments are resilient to the effects of climate change. ▪ The objectives and policies relating to the taking, damming, and diversion of groundwater are contained in Chapter E2. These require that groundwater diversions avoid, remedy, or mitigate effects on heritage, places of significance to Mana Whenua, people and communities, and does not exacerbate flooding or ground settlement risk. ▪ The objectives and policies in Chapter E14 seek to maintain high air quality and improve it where it is lower, protect human health, property, and the environment from adverse effects of air contaminants; and manage land use to minimise air quality effects and reverse sensitivity issues. These provisions recognise the need to provide for the operational needs of infrastructure.
AUP (RPS)	B3.2.1(1), B3.3.2(9) B7.5.1(1), B7.5.1(3), B7.5.2(1) B10.2.1(1),B10.2.1(2),B10.2.1(3),B10.2.1(4), B10.2.2(3), B10.2.2(4), B10.2.2(7), B10.2.2(12), B10.4.1(1), B10.4.2(1), B10.4.2(2), B10.4.2(3)	

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AUP (RP/DP)	E2.3(23) E7.2(1), E7.3(1) (refers to E1 and E2); E2.3(23) E10.2(1), E10.3(1), E10.3(2), E10.3(3) E11.2(1), E11.3(1), E11.3(2), E11.3(3), E11.2(4),E11.2(5), E11.3(6), E11.3(7) E14.2(1), E14.2(2), E14.3(1), E14.3(2), E14.3(8) E26.2.2(15) E30.2(1), E30.3(1), E30.3(2) E36.2(1), E36.2(2), E36.2(4), E36.2(5), E36.3(3), E36.3(13), E36.3(14), E36.3(15), E36.3(21), E36.3(23), E36.3(24), E36.3(29), E36.3(30), E36.3(31), E36.3(32), E36.3(33),	- The provisions under Chapter E30 relating to contaminant discharges seek to protect the environment and human health and enable land to be used for suitable activities now and in the future. The provisions require contaminated land to be appropriately managed or remediated through best practice contaminated land management prior to use. Assessment - In relation to natural hazards: - The Project is located in areas with existing natural hazard risks including flood hazards risks and land instability. - An Assessment of Stormwater Effects has been prepared to evaluate existing flood hazards and the potential effects of the Project on flood risk. The Project incorporates appropriate stormwater management measures, including stormwater detention devices, to manage identified risks and avoid exacerbating flood hazards. - As part of this phase of the Project, geotechnical investigations and assessments have been undertaken to characterise ground conditions and identify areas with potential land instability. The findings of these investigations have informed the engineering design of the Project, including the adoption of appropriate geotechnical mitigation and design measures. The design incorporates retaining walls, battered slopes, piles and abutments where required to maintain slope stability and manage geotechnical risks. Accordingly, the Project is designed to avoid, remedy or mitigate adverse effects associated with land instability and will not materially increase risk to people, property, infrastructure or the environment. - In relation to environmental risk: - The Assessment of Groundwater Effects concludes that where deep cuts are proposed and are likely to intercept groundwater levels, the risk of groundwater drawdown and settlement effects are negligible to very low. Accordingly, the Project is consistent with the objectives and policies pertinent to hydrogeology. - Effects of the Project on ambient air quality during the construction will be managed through the implementation of the DMP. Operationally, actual air quality impacts are not material and minimised as far as possible consistent with the nature of the transport infrastructure project proposed. Accordingly, the Project is consistent with the air quality objectives and policies. - A DSI was prepared to quantify the nature and extent of soil contaminant conditions within the Project area in accordance with Ministry for the Environment Contaminated Land Management Guideline No 5, Site Investigation and Analysis of Soils (revised 2021). A CSMP has been prepared in accordance with the Ministry for the Environment Contaminated Land Management Guidelines No. 1, Reporting on Contaminated Sites in New Zealand (revised 2021) to manage construction related effects associated with contaminated soils. Accordingly, the Project is consistent with the objectives and policies pertinent to contaminated land.
Mana Whenua		
NPS-I	Policy 6	Summary of relevant objectives and policies
AUP (RPS)	B6.2.1(1), B6.2.1(2), B6.2.2(1) B6.3.1(1), B6.3.1(2), B6.3.1(3), B6.3.2(1), B6.3.2(2), B6.3.2(3), B6.3.2(4), B6.3.2(5) B6.5.1(1), B6.5.1(2), B6.5.1(4), B6.5.1(5), B6.5.2(1), B6.5.2(2), B6.5.2(6), B6.5.2(8), B6.5.2(9)	- The objectives and policies in Chapter B6 of the RPS seek recognition and provision for the principles of the Te Tiriti o Waitangi / the Treaty of Waitangi and identify that this should occur through the active participation of Mana Whenua in resource management planning processes as kaitiaki. The provisions further seek to ensure that Mana Whenua cultural values are assessed and provided for through planning processes, and consequently that environmental health/mauri of natural and physical resources is ultimately enhanced. - In addition, the AUP provisions also seek to: - protect the relationship of Mana Whenua with environmental features scheduled in the plan, including sites and places of significance to Mana Whenua, as well as natural heritage and natural resource features; - ensure that mātauranga Māori and tikanga Māori protocols are followed when Mana Whenua cultural heritage features are discovered. - Policy 6 of the NPS-I directs that decision-makers must recognise and provide for Māori interests in relation to infrastructure activities and infrastructure-supporting activities by (relevantly) taking into account the outcome of engagement with tangata whenua on any relevant resource consent or NoR. Assessment - Mana Whenua have been actively involved as partners of the Project over the course of its history (including through the 2014-16 AT designation process, Te Tupu Ngātahi's involvement from 2019-21, and the current NZTA proposal). Project Teams have regularly engaged directly with Mana Whenua representatives throughout the development of the designation and the detailed design phase through regular hui. These hui have provided numerous opportunities for kōrero, knowledge sharing, exercise of Kaitiakitanga; particularly regarding the Project outcomes. NZTA's partnership with Mana Whenua has included the engagement of independent planning, ecology, and transport advisors to support Mana Whenua engagement through the current application process. - NZTA recognises and acknowledges that the Project traverses a culturally significant landscape. Acknowledging the potential effects of the Project on the cultural landscape, NZTA has worked collaboratively with Mana Whenua to develop and refine the Project's design, relevant management plans, and proposed conditions including: - A cultural values condition which provides for the ongoing Mana Whenua involvement in subsequent stages of the Project; - A proposed condition on the designations which requires that Mana Whenua values associated with the area affected by the Project's construction to be recognised and provided for through the development of a CMP; and - A process for the removal of ancestral raakau within Puhinui Gully and Cheesman's Bush (and their potential repurposing) as part of the OGTMP. - Mana Whenua have stated that, even if the measures above are implemented, they consider that there are significant adverse effects on their cultural values associated with the loss of ancestral raakau that cannot be mitigated. - Considering the above, it is considered that the adverse effects of the Project will be managed in a manner that is consistent with the relevant objectives and policies of Chapter B6 of the RPS and the NPS-I. While it is recognised that the Project will result in significant unavoidable adverse effects resulting from the removal of Significant Trees, it is considered that NZTA have undertaken appropriate measures to avoid and minimise those effects and have committed to undertake further measures to reduce these effects through future phases of the Project.
Historic heritage		
AUP (RPS)	B5.2.1(1), B5.2.2 (1), B5.2.2(6), B5.2.2(7)	Summary of relevant objectives and policies
AUP (DP)	D17.2(1), D17.2(2), D17.3(4)	- The objectives and policies in Chapters B5 and D17 of the AUP seek that scheduled historic heritage places are protected from inappropriate use and development including demolition or destruction; and that where adverse effects cannot be avoided, they are remedied or mitigated. - The infrastructure objectives and policies of the plan also acknowledge that infrastructure may have a functional or operational need to locate in particular environments, including areas of identified value relating to historic heritage. Assessment - The Project's impacts on scheduled historic heritage features under the AUP have largely been avoided. In the urban section, the project works are nearby, but do not encroach the scheduled extent of the St John's Redoubt.

Plan / Policy Document	Key Objectives and Policies	Summary and Assessment
		▪ In the rural section, the Project directly affects the Alfriston Meeting House (R11/2074) which is a listed NZAA archaeological site. There is potential to encounter or destroy other subsurface features associated with the Alfriston Meeting House, and at the site of the previous Alfriston Post Office (R11/2069). There is also potential to encounter previously unrecorded archaeological sites during the construction of the Project. ▪ The Assessment of Archaeological and Historic Heritage Effects submitted with the SAR (see Appendix C19) confirms that these effects can be managed through the HHMP included in the SAR (see Appendix C20). The Alfriston Meeting House will either be demolished, with recording undertaken as per HNZPT Archaeological Guidelines Series No.1: Investigation and Recording of Buildings and Standing Structures (November 2018) or relocated to an alternative site if practicable and if a third party (new owner) can be identified who is willing to accept the building in its current condition and undertake any necessary renovation or remedial works to enable its adaptive reuse. Overall, the Project is consistent with the relevant historic heritage objectives and policies.
Electricity transmission		
NPS-EN	Objective 1 Policies 11, 12	Summary of relevant objectives and policies ▪ The objectives and policies in the NPS:EN and Chapters D26 and E26 of the AUP seek that the national significance of the electricity transmission network (National Grid) is recognised and provided for, and that the adverse effects of other activities on this network are managed. The AUP includes the National Grid Corridor Overlay which regulates activities within the footprint of national grid assets. Assessment ▪ The National Grid Corridor Overlay crosses the corridor at the existing intersection of Redoubt Road and Murphys Road. Two Transpower towers sit within the Project designation and the lines traverse the road. The Project will require the relocation of one existing electricity transmission tower. ▪ Ongoing engagement has been occurring with Transpower including in relation to the relocation of the electricity transmission tower. Transpower is seeking separate approval for the relocation of the affected electricity transmission tower. ▪ Further consultation and engagement will be undertaken with Transpower prior to and during construction in accordance with the National Code of Practice for Utility Operators' Access to Transport Corridors (Utilities Access Act 2010). ▪ Accordingly, the Project is consistent with the identified objectives and policies in that it recognises the national significance of the National Grid; and sets in place appropriate measures to manage adverse effects such that the operation of the national grid is not compromised.
AUP (RPS) / DP	B3.2.1(7) D26.2(1), D26.2.3(1) E26.2.1(7)	
NES-ET		▪ The NES-ET is not relevant to this Project. Transpower is seeking separate consent for the relocation of its transmission tower.