

# Invitation for Comment on Papakura to Drury South State Highway 1 Improvements

The Papakura to Drury South State Highway 1 Improvements is a Listed Project under the COVID-19 Recovery (Fast-track Consenting) Act 2020

<b>Application Name</b>	Papakura to Drury South State Highway 1 Improvements – Stage 1B1
<b>EPA Reference</b>	FTC000015
<b>Applicants</b>	Waka Kotahi NZ Transport Agency and Transpower New Zealand Limited
<b>Comments due by</b>	<b>Friday, 24 September 2021</b>
<b>Accessing the application</b>	The full application and supporting documents can be viewed on the EPA website, which can be accessed here:  <a href="https://www.epa.govt.nz/fast-track-consenting/listed-projects/papakura-to-drury-south-state-highway-improvements/">https://www.epa.govt.nz/fast-track-consenting/listed-projects/papakura-to-drury-south-state-highway-improvements/</a>

Notices of requirement have been lodged and applications made by Waka Kotahi NZ Transport Agency and Transpower New Zealand Limited for Stage 1B1 of Papakura to Drury South State Highway 1 Improvements under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

To comment on the Stage 1B1 Papakura to Drury South State Highway 1 Improvements applications and notices of requirement using the form below, please fill in the details and:

- **Email** the form to [papakuradrury.fasttrack@epa.govt.nz](mailto:papakuradrury.fasttrack@epa.govt.nz). Please mark in the subject line: “Comments on Stage 1B1 of Papakura to Drury South State Highway 1 Improvements Fast Track Application (Your name/organisation) by **Friday, 24 September 2021**”; or
- **Post** the form to Papakura to Drury South State Highway 1 Improvements Fast Track Application, Environmental Protection Authority, Private Bag 63002, Waterloo Quay, Wellington 6140 in time for the form to be received by the **Friday, 24 September 2021**; or
- **Deliver in person** to Environmental Protection Authority, Grant Thornton House, Level 10, 215 Lambton Quay, Wellington by the **Friday, 24 September 2021**. *Please note that due to potential changes in COVID-19 Alert Levels our reception may not be open to the public. We suggest phoning ahead to check.*

**Comments must be received by the EPA, on behalf of the Papakura to Drury South State Highway 1 Improvements Expert Consenting Panel, no later than Friday, 24 September 2021**

If your comment is not received by the EPA by **Friday, 24 September 2021** the Panel is not required to consider your comment (although it may decide to). Under the COVID-19 Recovery (Fast-track Consenting) Act 2020 there is no right to seek a waiver of the time limit.

If you are an iwi authority you may share the consent application with hapū whose rohe is in the project area in the application, and choose to include comments from the hapū with any comments you may wish to provide.

## Important information

Your personal information will be held by the EPA and used in relation to the Stage 1B1 Papakura to Drury South State Highway 1 Improvements consent application and notices of requirement process. You have the right to access and correct personal information held by the EPA.

A copy of your comments, including all personal information, will be provided to the Expert Consenting Panel and the applicant.

All comments received on the application and notices of requirement will be available on the EPA website.

If you are a corporate entity making comments on this application and notices of requirement, your full contact details will be publicly available. For individuals, your name will be publicly available but your contact details (phone number, address, and email) will not be publicly available.

Please do not use copyright material without the permission of the copyright holder.

All information held by the EPA is subject to the Official Information Act 1982.

More information on the fast-track consenting process can be found at <https://www.epa.govt.nz/fast-track-consenting/about/>.

## Comment on the Stage 1B1 Papakura to Drury South State Highway 1 Improvements applications and notices of requirement

All sections of this form with an asterisk (\*) are mandatory.

### 1. Contact Details

Please ensure that you have authority to comment on the application and notices of requirement on behalf of those named on this form.

<b>Organisation name (if relevant)</b>	Watercare Services Ltd.		
<b>*First name</b>	Tim		
<b>*Last name</b>	Barry		
<b>Postal address</b>	73 Remuera Road		
<b>*Home phone / Mobile phone</b>	021836739	<b>*Work phone</b>	021836739
<b>*Email (a valid email address enables us to communicate efficiently with you)</b>	tim.barry@water.co.nz		

### 2. \*We will email you draft conditions of consent for your comment about the application and notices of requirement

<input checked="" type="checkbox"/>	I can receive emails and my email address is correct	<input type="checkbox"/>	I cannot receive emails and my postal address is correct
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### 3. Please provide your comments on the application and notices of requirement

If you need more space, please attach additional pages. Please include your name, page numbers and Project name on the additional pages

#### Overall Summary:

1. Watercare's comments relate to specific parts of Papakura to Drury South State Highway 1 improvements, Stage 1B1. Waka Kotahi NZ Transport Agency (Waka Kotahi) and Transpower New Zealand Limited have applied for resource consents and notices of requirement. This a listed project in the COVID-19 Recovery (Fast-track Consenting) Act 2020 (the Act).

Watercare's position

2. The Papakura and Bombay (P2B) project is a Waka Kotahi project to improve the safety and functionality of SH1 and provide for long-term growth in the south of Auckland. The P2B project is intended to be delivered in five stages consisting of Stage 1A, Stage 1B1, Stage 1B2, Stage 2 and Stage 3. Stage 1B1 is referred to as 'the Project' in this memo.

3. Stage 1B1 relates to the State Highway section between the Papakura Interchange to south of the Drury Interchange (Quarry Road). Watercare recognises the importance of this package of resource consent applications and the related new and altered designations which will contribute to improving the safety and resilience of the state highway network.

4. In principle, Watercare supports the application but seeks to ensure that our existing and planned assets are protected in accordance with the Resource Management Act 1991 ('RM') and The COVID-19 Recovery (Fast-track Consenting) Act 2020 (the Act).

5. Through this feedback, Watercare wishes to ensure that the Stage 1B1 works protect existing and future water and wastewater assets and provide for Watercare's ability to safely and reliably provide water and wastewater services to Auckland. The following provides high level feedback to the proposal.

Specific Parts of the Application Subject to this Feedback

6. The specific parts of the application that this feedback relates to are the potential effects of the Waka Kotahi NZ Transport Agency Resource Consent application on Watercare's existing and planned water and wastewater network. No feedback is provided on the application sought by Transpower New Zealand as Watercare assets are not anticipated to be affected by this proposal.

7. Watercare is concerned that the Waka Kotahi application has not fully considered all potential adverse effects on Watercare assets in the project area nor does this provide, any guarantee that its assets will be protected. The proposed works could adversely affect the operation, maintenance, and upgrading of Watercare assets through damage as a result of construction activity and / or through restricting access its assets for routine operation and maintenance purposes as a result of the corridor changes.

8. Watercare has existing and planned critical infrastructure located within and immediately adjoining the area of Stage 1B1. Some assets will require additional temporary and / or permanent protection. With exception of the Waikato Watermain #1, the assets listed in Table 1 are not detailed in the Waka Kotahi application. Table 1 provides additional information regarding these assets.

**Thank you for your comments**

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Additional Pages 3 off Pages 5-7– Tim Barry Watercare Services Ltd

Table 1: Watercare assets known to be located within the project area of Stage 1B1

Watercare Asset	Location Information	Stage 1B1 potential impact
200mm PVC-U 147 Harbourside Drive	Wastewater pipe across SH1 adjacent 147 Harbourside Drive	Not anticipated. Waka Kotahi to confirm.
Hingaia Road services	Pipe is located on the bridge	Likely to be affected by Stage 1B1. The Shared Use Path is in close proximity to pipeline
Papakura South Branch 400mm PE Rising Main	Pipe is located on the bridge above the motorway carriageway	Not anticipated. Waka Kotahi to confirm.
Park Estate Bridge	Pipe is located on the bridge above the motorway carriageway	Waka Kotahi and Watercare have an existing agreement related to when this bridge is widened.
Slippery Creek WW 200mm	Pipe is below the road carriageway	Works are not proposed during Stage 1B1. Note for future applications, this pipe will require conduit protection.
New WW rising main from new PS (not showing on GIS) <sup>1</sup>	Pipe is below the Mercer Street carriageway, and motorway carriageway	This pipe will require conduit protection as part of Stage 1B1.
Mercer street 400mm PE watermain NIMT intersection	Pipe is located below street carriageway.	Not anticipated. Waka Kotahi to confirm.
Waikato Watermain #1 Flannagan Road	Pipe is located immediately west of SH1, and south of Great South Road	This pipe will require relocation as part of Stage 1B1. This is described further in points 10 – 14 below.
Waikato Watermain #1 Pitt Road	Pipe is below the road carriageway. It connects to	This pipe will require conduit protection as part of Stage 1B1.

<sup>1</sup> The as-Built drawing 2013131.004 of the wastewater rising main is available from Watercare. Please contact Tim Barry, Watercare Infrastructure Interface Manager, 021836739.

	Flannagan Road Waikato #1.	
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1. If relocation or changes are required to any of the infrastructure listed in Table 1, or any Watercare assets located during construction, the process for relocating water and wastewater pipes and construction methodologies that the applicant intends to use adjacent to or above Watercare assets must be clarified and agreed with Watercare.

#### **Waikato Watermain #1 (Flannagan Road) Relocation**

2. The Waikato watermain #1 is one of the most critical water assets in Auckland, particularly for drought resilience purposes. The relocation of this watermain is very significant work with critical risks. The Waka Kotahi application explains the necessity to relocate the Waikato watermain asset (AEE, section 2.1.6.2). This is proposed as part of the 'Waikato Pipeline Relocation project' (AEE, section 2.2.1). Once relocated, the existing pipeline is proposed to be abandoned.
3. No specific consents are sought for the Waikato watermain relocation as the applicant considers the earthworks quantities to provide for all activities (AEE, section 2.1.6.2). However, the application does not make clear whether the relocation activity is to be undertaken as part of the Stage 1B1 proposed works (AEE, section 2). The drawings supplied by the applicant do not show the alignment agreed with Watercare (section 3.5, Appendix C).
4. Watercare requests the applicant seeks RMA authorisation for the Waikato watermain relocation. This should be clearly stated in the proposal and shown the relocated alignment on the plans to be consented. The relocation is required only as a result of the Stage 1B1 project.
5. The Waka Kotahi application (section 2.2, Appendix C) states the Waikato watermain relocation can only take place during winter due to the reduced demand within the pipeline. Watercare can clarify that only the cut-over (the live water connection) is subject to seasonal constraint, not the physical relocation of the pipeline. Watercare recommends this construction is undertaken during the earthworks season by experienced contractors.
6. Watercare seeks confirmation that they will be directly involved in the development of the detailed design, construction management, the cut-in and livening of the Waikato watermain (Flannagan Road).
7. The AEE states the Project will provide infrastructure that is resilient to the current and future effects of climate change by allowing for climate change in the design and selection of stormwater devices and supports a reduction in greenhouse gas emissions by promote modes of sustainable transport. In order to reduce the carbon footprint of the Waikato Watermain #1, Watercare requests the consideration that the existing pipeline (once superseded) is removed rather than filled with concrete.

#### **Relief Sought**

8. Watercare seeks to ensure that its assets are appropriately provided for in the conditions of the designations that may be confirmed and resource consents that may be granted, so that:

- Waka Kotahi recognises and provides for Watercare’s existing infrastructure within the road corridor. Any adverse effects on Watercare’s assets and operations are avoided, remedied, or mitigated.
  - If diversions or relocations of Watercare’s assets are required Waka Kotahi will first enter into an agreement with Watercare prior to construction which includes meeting Watercare’s standards, including but not limited to; cost sharing, design approvals, contractor approvals and shutdown notice periods;
  - Waka Kotahi incorporates methodology to prevent adverse effects on Watercare’s infrastructure assets. Waka Kotahi provides Watercare with an advanced works plan detailing how Watercare’s existing assets will be protected during construction works;
  - This plan should be developed in consultation with Watercare and must be approved by Watercare’s works-over team;
  - Waka Kotahi must provide Watercare with a management plan related to the relocation and tie-in to the (Flannagan Road) Waikato #1 pipeline one year in advance of construction commencing. This plan should be developed in consultation with Watercare operations team and will be approved by Watercare’s works-over team;
  - Waka Kotahi will schedule cut in dates with Watercare well in advance (ideally a year) with reserve dates for instances where the programme could slip;
  - Waka Kotahi is encouraged to develop a construction programme that isolates the watermain works from the general project critical path so as to not to create unnecessary dependencies;
  - Watercare maintains access to its assets 24 hours a day, 7 days a week;
  - Watercare is regularly consulted on and engaged with throughout construction of the proposed roading infrastructure;
  - Watercare is provided with operational ‘Standard Operating Procedures’, and approval and certification procedures and processes needed for when the relocated Waikato watermain #1 is commissioned; and
  - All new water and wastewater assets are to be vested to Watercare within a reasonable time of As-Builts being produced.
9. Watercare seeks confirmation that if diversions or relocations are required (either on a permanent or temporary basis) the Applicant will jointly develop work plans with Watercare and approval from both parties is required to proceed.
10. Watercare’s Asset Protection team expects that Works Over approvals are gained for each stage of the works, and that Waka Kotahi understands and meets Watercare’s requirements.
11. Existing access agreements must maintain the ability for Watercare to access Watercare assets.