

**BEFORE THE GREATER WELLINGTON REGIONAL COUNCIL AND HUTT
CITY COUNCIL
EASTERN BAYS SHARED PATH PROJECT**

Under the Resource Management Act 1991

In the matter of applications for resource consents by Hutt
City Council under section 88 of the Act, to
carry out the Eastern Bays Shared Path Project

**STATEMENT OF EVIDENCE OF SIMON ALAN CAGER (PROJECT OVERVIEW
AND ENGAGEMENT) ON BEHALF OF THE APPLICANT**

30 November 2020

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QUALIFICATIONS AND EXPERIENCE

1. My full name is **Simon Alan Cager**. I am a Senior Project Engineer at Hutt City Council ("**HCC**").
2. My evidence is given on behalf of HCC in relation to its applications under section 88 of the Resource Management Act 1991 ("**RMA**") for resource consents for the Eastern Bays Shared Path Project ("**Project**").
3. I have the following qualifications and experience relevant to the evidence I shall give:
 - (a) I hold a Bachelor of Engineering (Hons) Degree in Civil Engineering obtained from Kingston University (UK) in 1996.
 - (b) Since 2015, I have been the Senior Project Engineer for HCC in the Transport Division. Prior to this I was the Infrastructure Investigations Engineer for Palmerston North City Council from 2011 to 2015, and before that a Project Manager in Transport for MWH Ltd (now Stantec) from 2008 to 2011.

SCOPE OF EVIDENCE

4. The purpose of my evidence is to provide a high level introduction to the Project and its development to date, with a particular focus on the engagement carried out by HCC with key stakeholders and the general public in developing the Project.
5. My evidence addresses:
 - (a) my role in respect of the Project;
 - (b) the development of the Project to date;
 - (c) the need for the Project and its key benefits for local communities, the district and the region;
 - (d) the consultation and engagement carried out by HCC and the Project team with stakeholders, and how the Project has evolved in response to that consultation and engagement; and
 - (e) responses to submissions and the Greater Wellington Regional Council ("**GWRC**") section 42A report.

EXECUTIVE SUMMARY

6. The completion of the proposed new shared path ("**Shared Path**") has been an aspiration for HCC and Eastern Bays residents for many years. The Shared Path has featured in past HCC strategies and is a key project in providing a safe and integrated network for commuting and recreational purposes.

7. The Shared Path forms a key part of the Great Harbour Way / Te Aranui o Pōneke, a walking and cycling route around Te Whanganui-a-Tara / Wellington Harbour. Work is currently progressing on a number of projects around the harbour including Waka Kotahi NZ Transport Agency's ("**Waka Kotahi**") Te Ara Tupua – Ngā Ūranga ki Pito-One shared path to complete this route.
8. HCC needs to protect the resilience of the road and underground services by upgrading the supporting seawalls. Marine Drive provides the only road access to the Eastern Bay suburbs and is therefore a key transport route for the region. It is currently vulnerable to closure, and/or reduced operation, in part due to wave overtopping due to the current state of the coastal edge. Over time sea levels will rise, with projections forecasting a 16cm sea level rise by between 2030 and 2040, thereby exacerbating the current vulnerability of Marine Drive.
9. The Project is not a solution to the effects of sea level rise, and instead provides the first step in potential incremental upgrades. As an adaptation model, the seawalls do not preclude future options and have been designed to enable additional protection to be added in the future if considered by the Eastern Bays community to be appropriate.
10. The preliminary design for the Project has gone through a series of iterations that were considered against the parameters of the natural environment (such as coastal processes and ecologically sensitive areas – intertidal and subtidal areas), to achieve an optimum design.
11. The Project will provide a safe and connected walking and cycling route along Marine Drive, providing enhanced connections locally and within the region. This enhanced connectivity will result in significant social, economic and recreational benefits, including:
 - (a) improved safety for pedestrians, cyclists and other road users;
 - (b) recreation and tourism opportunities;
 - (c) economic opportunities and job creation; and
 - (d) positive benefits to health and wellbeing.
12. In addition to increased connectivity, the Project includes the replacement of some of the seawalls to provide improved protection from storm events for Marine Drive and other infrastructure contained within the Marine Drive road corridor. This will provide the first step in enabling the Marine Drive road corridor to respond to the challenges of sea level rise and climate change.
13. I was involved in the formation of a Little Penguin Interest Group ("**LPIG**") who undertook investigations into measures to protect penguins and shorebirds, and identified other measures including restrictions placed on

construction works during nesting season, fencing areas to protect birds from people and dogs, dog control (signage and prohibited entry) and pest control. Further work has been done to refine the Project's measures for avoiding effects on penguins and shorebirds, as outlined in the evidence of **John Cockrem** and reflected in the conditions appended to the evidence of **Caroline van Halderen**.

ROLE IN THE PROJECT

14. In preparing my evidence I have:
- (a) familiarised myself with all the material in the application documentation, including the reports prepared by the various experts who have advised HCC in the course of developing the design.¹ I have relied on the information provided by those experts in forming my own opinions as well as my involvement within the Project team;
 - (b) read the draft evidence of:
 - (i) **Ihakara Puketapu-Dentice** (strategic overview and engagement);
 - (ii) **Ms van Halderen** (planning); and
 - (iii) **Jamie Povall** (Project design and transport and safety);
 - (b) attended technical workshops;
 - (c) attended stakeholder and community meetings;
 - (d) attended community days;
 - (e) attended numerous site visits with technical experts, the design team and HCC and GWRC officers;
 - (f) attended the pre-hearing meetings;
 - (g) attended Council and internal meetings to provide updates on the status of the Project to both the Corporate Leadership Team and Councillors; and
 - (h) read the section 42A reports.
15. I am the HCC Senior Project Engineer responsible for managing and delivering the Project since 2015. I commissioned the Strategic Business Case, the Indicative Business Case and the Detailed Business Case for the Project which were completed by Stantec. I have led the wider Project team

¹ Eastern Bays Shared Path Resource Consent Applications and Assessment of Effects on the Environment ("**AAE**"), Stantec, April, 2019; and Appendices A – S to the AEE.

since its inception in 2016 and commissioned the technical experts for the Project.

16. I provided input into the design, and collaborated with the technical experts in developing a design, that I believe balances all the environmental constraints to develop a project that will achieve all the Project objectives and outcomes for the environment, the community and the city.
17. I was also part of the consultation team and attended most of the stakeholder and community meetings since the commencement of the Project.
18. I led the engagement with the LPIG in working through mitigation measures for the protection of penguins and shoreline foragers, including the commissioning of an independent facilitator.
19. I was involved in the process for obtaining funding from the Government's Covid-19 Response and Recovery Fund for the Project. Following HCC's successful application, I was then involved in developing the funding agreement with Crown Infrastructure Partners who are acting as the Government's agency for the fund.

DEVELOPMENT OF THE PROJECT

20. The Project includes construction of the Shared Path, a 4.4km cycleway/walkway along Marine Drive in two sections: between Point Howard and the northern end of Days Bay, and the southern end of Days Bay (Windy Point) to Eastbourne (Muritai Road / Marine Parade intersection). Approximately 5,000 people live along the Eastern Bays, with Marine Drive providing the only road and infrastructure service connection.
21. The completion of the Shared Path has been an aspiration for HCC and its Eastern Bays residents for many years. The Shared Path has featured in past HCC strategies and is a key project in providing a safe and integrated network for commuting and recreational purposes.
22. The Shared Path forms a key part of the Great Harbour Way / Te Aranui o Pōneke, a walking and cycling route around Te Whanganui-a-Tara / Wellington Harbour. Work is currently progressing on a number of projects around the harbour including Waka Kotahi's Te Ara Tupua – Ngā Ūranga ki Pito-One shared path to complete this route.
23. The 2014 Eastbourne Community Survey has shown that residents list the completion of the Shared Path, and concerns about climate change as the two most important issues facing the Eastern Bays communities. The Project presents an opportunity to integrate an efficient response to both of these issues.
24. As the Project is community-led, HCC has worked hard to keep the community informed and engaged, as discussed further in the evidence of

Ms van Halderen and Mr Puketapu-Dentice. The high level of community support is reflected in the submissions received.²

Funding

25. The Project features highly in the National Land Transport Programme ("NLTP") 2018-21 priority list for projects in the Wellington Region and is currently in the draft Regional Plan Transport Plan ("RLTP") and NLTP for 2021-24.
26. As discussed above, I was involved in obtaining funding for the Project on behalf of HCC. Funding is discussed in more detail in the evidence of **Mr Puketapu-Dentice**. However, in summary, the Project is forecast to cost approximately \$30 million, with the funding comprising:
 - (a) \$15 million from the Government, from the Covid-19 Response and Recovery Fund;
 - (b) approximately \$7.5 million from Waka Kotahi; and
 - (c) approximately \$7.5 million from HCC.

THE NEED FOR THE PROJECT AND ITS BENEFITS

27. The Project's aim is to develop a safe and integrated walking and cycling facility along Marine Drive to connect communities along Hutt City's Eastern Bays, and to provide links to other parts of the walking and cycling network for recreation and tourism purposes (the Remutaka Cycle Trail in particular, as well as the Great Harbour Way / Te Aranui o Pōneke). Currently, pedestrian and cyclist connectivity and use along the Eastern Bays is low, in part due to the perception of poor safety and the lack of any dedicated cycling and walking facilities given the tightly constrained nature of Marine Drive. For the most part, cyclists and pedestrians must use the road shoulder, which is very narrow and even non-existent in sections. Without the Project, this is a significant lost opportunity for the Eastern Bays community.
28. Furthermore, the Project provides a basis for future opportunities for protecting the resilience of the road and underground services by upgrading the supporting seawalls. Marine Drive is classified as a primary collector road, with traffic volumes of between 6,000 – 8,000 vehicles per day,³ and is the only road access to the residential Eastern Bays suburbs.

² 180 of the 200 submissions received on the Project were in support, including submissions from the Eastbourne Community Board (Virginia Horrocks and Belinda Moss), Lowry Bay Residents Association, Diane Cheyene (on behalf of Days Bay Residents Association), Alison Gandy (for Point Howard Association) and Petone Community Board. Eleven of the 15 submissions in opposition, and three of the five neutral submissions, were from Eastern Bays residents.

³ The Eastern Bays Shared Path *Transport Assessment*; Stantec, February, 2019. Appendix L to the AEE used a figure of 8,000. However, as discussed in the evidence of **Mr Povall**, this figure is now assessed as 6,000 – 8,000 due to higher volumes being recorded closer to Seaview with reductions closer to Eastbourne.

29. Storm events, king tides or the combination of both make Marine Drive vulnerable to closure, and/or reduced operation, in part due to wave overtopping and the current state of the coastal edge.
30. Over the last five years Council has spent \$275,000 on planned maintenance on the seawalls and \$210,000 on unplanned maintenance and repairs due to storm events. These unplanned works are increasing in both frequency and cost to Council.
31. Several sections of the current seawalls have been assessed as having less than five years remaining life. These sections will be prioritised for replacement during construction of the Project and will be replaced with a modern fit for purpose structure that is more effective at reflecting wave energy, thus reducing potential overtopping during weather events. This will also have the benefit of reducing planned and unplanned maintenance costs to Council.
32. The Project recognises the series of ongoing processes of managing coastal values in the face of climate change and sea level rise, and the related pressures faced by GWRC and HCC. However, the Project is not a solution to the effects of sea level rise, and instead provides the first step in potential incremental upgrades that would assist in providing protection to the road (and underground services) from the effects of sea level rise and climate change along this section of the coast. As an adaptation model, the seawalls do not preclude future options and have been designed to enable additional protection to be added in the future if considered by the Eastern Bays community to be appropriate.
33. **Figure 1**⁴ below shows the Shared Path indicated as part of the current and planned walking and cycling facilities in Lower Hutt.

⁴ Figure 1 updates the previous Figure ES-1 in the AEE.

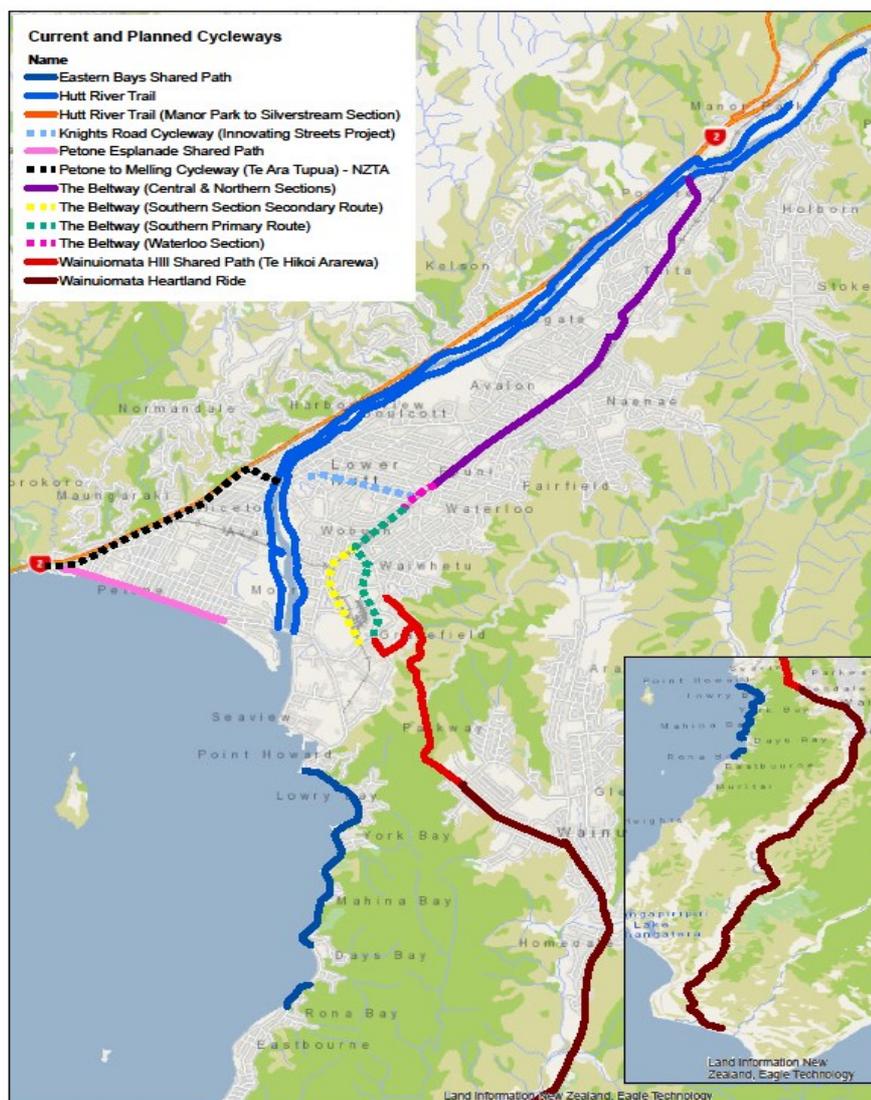


Figure 1: Current and Planned Cycleway Projects in Lower Hutt

Connectivity

34. The Project will provide a safe and connected walking and cycling route along Marine Drive, providing enhanced connections:
 - (a) within the individual bays (for recreation and access);
 - (b) between different bays (to shops, schools, recreation etc.);
 - (c) to and from Lower Hutt and beyond (to work, school or for recreation etc); and
 - (d) to other regional cycle routes, including the Great Harbour Way / Te Aranui o Pōneke walking/cycling route (Leg 3 Burdan's Gate to Seaview) and the proposed extension of the Remutaka Cycle Trail (one of the New Zealand Great Rides) from the mouth of the Orongorongo River to Burdan's Gate.
35. HCC is currently completing a Single Stage Business Case on the planning for the short, medium and long term programs to achieve a fully completed

active mode network for the City, with some of these projects likely to be in the Wellington Regional Transport Committee's draft RLTP and Waka Kotahi's draft NLTP 2021-24.

36. The enhanced connectivity will result in significant social, economic and recreational benefits, as explained in more detail in the evidence of **Robert Greenaway** and **Michael Copeland**, including:
- (a) improved safety for pedestrians, cyclists and other road users;
 - (b) recreation and tourism opportunities; and
 - (c) positive benefits to health and wellbeing.

Resilience

37. In addition to increased connectivity, the Project will provide the first step in enabling the Marine Drive road corridor to respond to the challenges of sea level rise and climate change.
38. The Project includes replacement seawalls to provide improved protection from storm events for Marine Drive and other infrastructure contained within the Marine Drive road corridor. The replacement seawalls will reduce overtopping and debris on the road and develop a consistent seawall design that can be added to in the future. The Shared Path will sit on top of the new seawall. The new seawall and associated features will provide enhanced environmental outcomes compared to the existing seawalls.

Active transport and community recreation

39. The Project will improve cyclist and pedestrian safety by providing a dedicated path separated from vehicles. Considering the current significant safety issues present on Marine Drive, as discussed in the evidence of **Mr Puketapu-Dentice**, this is a key benefit of the Project.
40. As noted above, and as explained in the evidence of **Mr Povall**, the Project will lead to improved connectivity of shared paths/cycleways and greater use:
- (a) between and within the Eastern Bays for recreation, access and commuting;
 - (b) to Lower Hutt (utilising the Te Awa Kairangi path and others as shown in **Figure 1** and **Figure 2** below) and beyond (utilising Te Ara Tupua – Ngā Ūranga ki Pito-One shared path) for work, education and recreation; and
 - (c) to other regional cycle trails, such as the Remutaka Cycle Trail, The Great Harbour Way / Te Aranui o Pōneke and the Beltway cycleway.
41. As shown in **Figure 1** above, and **Figure 2** below, the active transport connections in the Wellington Region, and Hutt City, are expanding and helping to make Lower Hutt a great place to live, work and play.



Figure 2: Eastern Bays Shared Path Scheme – Context to the Wider Network

42. HCC completed Te Hikoi Arawa (The Wainuiomata Hill Shared Path) in June 2019. Initial monitoring has shown it has been hugely successful with over 92,000 movements through the counter on the Hutt side of the hill and 131,000 movements on the Wainuiomata side of the hill.
43. Te Hikoi Arawa and the Pukeatua Bridge were co-funded with Waka Kotahi and the Crown as part of the Urban Cycleways Programme.
44. A user survey for Te Hikoi Arawa completed in July 2019 noted that 80% of respondents used the path for walking and 31% for cycling. Users gave recreation (80%) and health (69%) as their main purpose for using the path. Over 86% of the respondents thought the path made it easier to be more active. General feedback from both the community and Council was that the path provided a much safer connection to the Hutt Valley and was a great asset.
45. One of HCC's goals – reflected in its strategy documents – is the promotion of active transport, in particular walking and cycling. This has been a key driver of the Project, as well as a number of the connecting projects, such as Te Ara Tupua – Ngā Ūranga ki Pito-One shared path and RiverLink.⁵ These are two significant projects in terms of providing walking and cycle connections around Wellington Harbour, and in Lower Hutt City Centre, and are designed to promote active transport. The Project supplements the

⁵ An approximately \$400m Project.

benefits to be derived from these projects and fits within HCC's plans and aspirations for the future of Lower Hutt.

46. Beyond cycling recreation, another benefit of the Project is that the community will have safer and easier access to and along the coast, and therefore will be able to better enjoy, and connect with, the coast. HCC views the Project as a significant opportunity to enhance the community's already strong connection with such a dynamic and wonderful coastline. Use of signage boards and the protection areas will also enable education and the ability for the community to understand, see, and (if they wish) participate in nature programs.
47. In addition, the Shared Path will promote walking and running for the local community.

CONSULTATION AND ENGAGEMENT

Little Penguin Interest Group

48. Following the public notification of the Project and the receipt of submissions (November 2019), there was a high level of interest, and diverse views, on how to manage and protect penguins. To capture all the viewpoints and come to an agreement, a workshop was held in March 2020, which I attended, to bring all parties together with an interest in penguins.
49. The workshop was facilitated by Christine Foster (an Independent Commissioner) and, in addition to myself, was attended by:
 - (a) Sally Bain (Eastbourne Pest Control);
 - (b) Amelia Geary (Forest and Bird);
 - (c) Mike Rumble (Penguin Specialist, Eastbourne);
 - (d) Brent Tandy (Senior Ranger Biodiversity, Department of Conservation);
 - (e) Janet Lawson (Parks, Gardens and Reserves, HCC);
 - (f) Jonathon Frericks (Ecologist, HCC);
 - (g) Roger Uys (Senior Terrestrial Ecologist, WRC); and
 - (h) John Cockrem (Penguin Specialist advising the HCC Project Team).
50. The outcome of the workshop was a collection of potential options for protecting and managing potential effects on penguins, together with a brief summary of the merits, implications and support for each suggested option. The discussions at the workshop, and the options tabled, informed HCC's further thinking about project design, avoidance and minimisation measures, and the content of any Management Plan to address effects on penguins and shorebirds.

51. That workshop resulted in the formation of a LPIG who, over the following few months, undertook investigations into measures to protect penguins and shorebirds. While the COVID lockdown did impact that work for a time, a site visit was held in July 2020 when Level 4 was lifted.
52. A number of potential sites had been proposed during the workshop which were investigated for suitability during this site visit and three of these sites were agreed as suitable opportunities for penguin and shorebird protection areas. These were:
 - (a) Whiorau Reserve for penguins;
 - (b) Bishops Park for penguins and shorebirds; and
 - (c) HW Shortt Park for penguins and shorebirds.
53. Other measures identified by the LPIG included restrictions placed on construction works during nesting season, fencing areas to protect birds from people and dogs, dog control (signage and prohibited entry) and pest control.
54. Further work has been done to refine the Project's measures for avoiding effects on penguins and shorebirds, as outlined in the evidence of **Dr Cockrem**. This includes further measures to protect oystercatchers (a specific oystercatcher protection area at Sorrento Bay), further refinement of the three penguin and shorebird protection areas at Whiorau Reserve, HW Shortt Park and Bishops Park, and limitations during construction.
55. These measures are set out in the revised conditions appended to the evidence of **Ms van Halderen**, and include a Little Penguin Management Plan and a Habitat Enhancement Plan. While these measures are fully supported by HCC Parks and Reserves, there are legal processes to follow to implement certain measures (such as a dog by-law restricting dogs from sections of the beach).
56. The conditions relating to Little Penguins and Shoreline Foragers are conditions EM.1 to EM.6, and conditions EM.7 to EM.9 address the Habitat Enhancement Plan (which addresses the protection areas). Appendix 1 of the revised conditions includes maps of the protection areas.

RESPONSE TO SUBMISSIONS

Health and safety

57. Health and/or safety appeared in most submissions (171 out of 200); of those 171 submissions, the vast majority (159) were in support.⁶ In addition to a general support for the Project's improvements to cyclist and road safety, some of the key health themes that came through were as follows:

⁶ There were nine submissions in opposition that raised health and/or safety concerns (66, 84, 85, 87, 168, 174, 175, 179 and 190) and three neutral submissions (117, 132 and 177).

- (a) the Project will encourage more people (including children) to walk and cycle the route, where currently many consider the road too dangerous for this;
 - (b) the Project will contribute to healthy and fit children as they will be able to actively and safely commute to school, whereas currently they cannot safely cycle to school; and
 - (c) the increased recreational opportunities that the Project will present will have positive physical and mental health benefits.
58. This includes a submission from Doctors for Active, Safe Transport (185) which notes the significant health benefits from increased active transport (including cycling) and supports increased planning and investment in safe cycling infrastructure to connect every suburb.
59. These submissions focused on the benefits that will flow from increased walking and cycling and illustrate why the Council is prioritising the Project and active transport generally.

Connectivity

60. Twenty submissions, all of them in support of the Project, raised connectivity or linkages to other regional projects and cycleways as a theme, including:
- (a) increased accessibility to the Great Harbour Way / Te Aranui o Pōneke, Remutaka Cycle Trail, Hutt City and Petone and the Eastern Bays;
 - (b) creating more visibility for the Eastern Bays and Hutt City as a tourist attraction, thanks to greater recreational and transport opportunities;
 - (c) increased economic benefits as a result of people using the new and connected routes; and
 - (d) safety improvements for cyclists (for instance, many people like to cycle to Pencarrow Lighthouse).
61. Again, these submissions reiterate and are consistent with the Council's promotion of and vision for the Project.

Climate change

62. Of the 200 submissions received on the Project, 54 include climate change as a theme and of those 54, 51 submissions are in support (and one is neutral).⁷
63. These submissions reinforce the importance of the resilience benefits the Project will deliver, which I have outlined above. Climate change matters are

⁷ The remaining two are opposing, with one (Ann Elizabeth Bell (189)) conveying skepticism that residents who commonly use SUVs for transport will change to alternative forms of transport and the other (Michael Sheridan (66)) suggesting the Project's proposed seawall to respond to sea level rise is being advanced 20 years too early.

addressed above in this evidence briefly, and in more detail in the evidence of **Dr Allis**.

RESPONSE TO COUNCIL OFFICER'S SECTION 42A REPORT

GWRC

64. I note the GWRC section 42A report highlights a number of the positive benefits of the Project at section 12.15, including the transport mode shift at 12.15.1. As described above, this is a key benefit of the Project and I agree with the author that encouraging mode shift and providing travel choice will have positive knock-on effects but will also increase the efficacy of the other benefits such as health and wellbeing. As such, these benefits are firmly entwined with one another.

Simon Alan Cager

30 November 2020