

**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

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**STATEMENT OF EVIDENCE OF ROBERT JAMES GREENAWAY  
(RECREATION AND AMENITY VALUES) ON BEHALF OF THE APPLICANT**

30 November 2020

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## QUALIFICATIONS AND EXPERIENCE

1. My full name is **Robert James Greenaway**. I am a Director of Rob Greenaway & Associates (R&R Consulting (NZ) Ltd).
2. My evidence is given on behalf of Hutt City Council ("**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 Diploma in Parks and Recreation Management (with Distinction) obtained from Lincoln University in 1987.
  - (b) Since 1997 I have been a Director of Rob Greenaway & Associates (R&R Consulting (NZ) Ltd), (since 2006 I have been based in Nelson). Prior to this, I was a Recreation and Tourism Consultant for Boffa Miskell Limited from 1995 until 1997 (based in Christchurch), and before that, from 1990 until 1995, I was a Recreation and Tourism Consultant at Tourism Resource Consultants in Wellington.
  - (c) I have comprehensive experience in undertaking recreation planning and management assessments and have completed more than 400 consultancy projects nationally.
  - (d) I have presented evidence at approximately 100 hearings (approximately half for the Environment Court or Environmental Protection Authority), many of which related to marine and coastal developments, including: marina proposals (Waikawa, Lyttelton, Bayswater, Waiheke Island), port dredging and development (Lyttelton, Whangarei), marine mining (Taranaki), the wreck of the Rena, marine farming (King Salmon, Port Gore, Kaipara Harbour, Port Levy and Mercury Bay), and marine discharges (Waimate, Nelson, Christchurch, Porirua, Wellington, Taranaki).
  - (e) I have also worked on several coastal pathway projects, including for Auckland Council on the Orewa seawall proposal and Te Whau Pathway, and for Waka Kotahi NZ Transport Agency ("**Waka Kotahi**") on the Te Ara Tupua – Ngā Ūranga ki Pito-One shared path proposal.
  - (f) In Wellington I have recently worked on investigations for CentrePort's harbour deepening and Wellington International Airport's runway extension, the Mt Victoria Masterplan (with Megan Wraight) for Wellington City Council, and Wellington Water's Seaview wastewater outfall redevelopment and their cross-harbour water pipeline investigations.

- (g) In 2016 I completed a major user survey of the Hutt River corridor for the Greater Wellington Regional Council ("**GWRC**"), and late last century helped manage the 'Big Coast' mountain bike events which circumnavigated the Remutaka Range.
  - (h) I am an accredited Recreation Professional with Recreation Aotearoa (the New Zealand Recreation Association). I am also a past executive member of the National Executive of Recreation Aotearoa, and I am an ex-Chair and current member of the Recreation Aotearoa Board of Accreditation. I was awarded the Ian Galloway Memorial Cup in 2004 by Recreation Aotearoa to recognise "excellence and outstanding personal contribution to the wider parks industry". In 2013 I was awarded the position of Fellow of Recreation Aotearoa.
  - (i) I am Deputy Chair of the Nelson Marina Advisory Group to the Nelson City Council.
4. I confirm that I have read the 'Code of Conduct' for expert witnesses contained in the Environment Court Practice Note 2014. My evidence has been prepared in compliance with that Code. In particular, unless I state otherwise, this evidence is within my sphere of expertise and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

#### **SCOPE OF EVIDENCE**

5. The purpose of my evidence is to discuss the recreation, tourism and associated amenity effects of the Project.
6. My evidence provides:
- (a) context for the Project;
  - (b) a methodology for the preparation of my evidence;
  - (c) an overview of the existing recreation, tourism and amenity values within the Project area;
  - (d) the potential effects of the Project on these recreation, tourism and amenity values;
  - (e) steps taken to address potential adverse recreation, tourism and amenity effects through design and as set out in the conditions;
  - (f) conclusions on effects taking into account the recommended mitigation; and
  - (g) responses to submissions and the section 42A reports.

## CONTEXT

7. The Eastern Bays from Point Howard to Sunshine Bay and including Windy Point ("the **study area**") is a highly modified urban environment, characterised by an existing seawall along most of Marine Drive.<sup>1</sup>
8. The existing road shoulder on the coastal side of Marine Drive is currently used for local recreation, particularly walking, dog-walking and cycling.<sup>2</sup> A 2014 survey showed that 70% of the Eastern Bays adult population used the existing walkway and cycleway on the road shoulder along Marine Drive at least monthly. However, over half of survey respondents said the current state of the path setting deterred them from using it and described it as unsafe or very unsafe.<sup>3</sup>
9. The gravel beaches in the study area are small in extent and highly modified.<sup>4</sup> A lack of visitor parking and poor coastal access inhibits use of most of the bays by visitors; otherwise they are used by mostly locals for swimming, small boat launching, walking, dog walking, and some shellfish gathering and floundering.<sup>5</sup>

## METHODOLOGY

10. In preparing my evidence I have undertaken:
  - (a) a site visit and review with other Project advisors (and as an ex-Wellington resident and frequent visitor, I know the area well);
  - (b) an analysis of the preferred path width for the shared path ("**Shared Path**") part of the Project;
  - (c) a review of relevant national and regional plans and policy documents to investigate the fit of the Project;
  - (d) a literature review, including consultation completed for the Project, to identify the coastal values which could be affected by the development, as well as wider community expectations for the Shared Path;
  - (e) interviews with 20 users of the study area to better identify the scale and type of recreational use of the Eastern Bays coast;
  - (f) a review of effects and mitigation recommendations for each section of the study area; and
  - (g) a review of the benefits of the Shared Path.

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<sup>1</sup> See AEE at section 24.3.6.

<sup>2</sup> See AEE at sections 1.5 and 16.1 and Appendix K to the AEE at section 1.3.2.

<sup>3</sup> See Appendix K to the AEE at section 4.3.2 and Tables 5 and 6.

<sup>4</sup> See AEE at section 13.1.

<sup>5</sup> See AEE at section 9.1 and Appendix K to the AEE at section 1.3.2.

11. I prepared the technical report *Eastern Bays Shared Path Recreation Assessment* dated January 2019 in Appendix K of the Assessment of Effects on the Environment ("**AEE**").
12. I was not involved in the preparation of the *Alternatives Assessment* (Appendix G to the AEE) but I have read it in preparing my evidence. That assessment, which is discussed in the evidence of **Jamie Povall**, reviews the option of constructing a shared path on the landward side of Marine Drive and concludes that the seaward side is preferred for a variety of reasons. From a recreation and tourism perspective, locating the Shared Path on the seaward side of the road is clearly preferred; this being the more attractive setting with direct access to beaches and fishing sites. There appears to be no expectation from consultation, or from interviews for my technical report, that any other location than the seaward position is in contention.

### **EXECUTIVE SUMMARY**

13. The Eastern Bays in the study area are mostly of local recreation value, used for swimming, small boat launching, walking and dog walking. The exceptions are Point Howard Beach, which has regional recreation value for beach activities, and the Ferry Road headland at the southern end of Sunshine Bay and the revetment at the western corner of Whiorau Reserve which are regionally popular coastal fishing sites. There is also some regional-level shellfish harvesting along the rocky parts of the study area and, especially, in the sands below low tide at Lowry Bay.
14. The key recreation and tourism issues arising from the Project include (beyond its obvious benefits to recreation and tourism) minimising adverse effects on existing recreation opportunities along the Eastern Bays coast, ensuring that the width of the Shared Path is suitable for the likely user groups, and checking that the Project aligns with the New Zealand Coastal Policy Statement ("**NZCPS**") and other regional planning and policy documents in relation to recreation values.
15. Demand for the Project is very high, and its construction will result in significant changes to how Eastern Bays residents commute and participate in recreational activities, and will benefit residents regionally via the development of a new and attractive walking and cycling destination. The net benefit of the Project for recreation will be positive and substantial.
16. As discussed in **Mr Povall's** evidence, construction processes will be staged, and standard traffic management processes will be applied to minimise effects on existing users. The construction effects will be temporary and will result in a significant community asset. In my opinion, mitigation specific to recreation amenity is not required beyond that recommended for traffic management.

17. Operational effects mostly relate to the potential loss of high tide beaches due to encroachment by the Shared Path, and loss of beach width generally. I agree with the need for path widths of 2.5m at Sorrento Bay, Mahina Bay, Lowry Bay and Sunshine Bay. In the other areas, 3.5m is the preferred minimum width.
18. The Project will result in a more consistent and formal treatment of the coastal edge, as discussed in the evidence of **Julia Williams**, who considers that any long term adverse effects on visual amenity will be low to very low, and effects at a local scale and on a bay-by-bay basis have the potential to be very low or even beneficial.
19. The Project responds effectively to national policy and planning documents such as the NZCPS, and regional policy and planning documents, such as the Regional Policy Statement for the Wellington Region ("**Wellington RPS**"), Regional Coastal Plan for the Wellington Region 2000 ("**RCP**") and Proposed Natural Resources Plan ("**PNRP**"). There is clear congruence between the Project and the NZCPS. The Project is an enhancement to "*access to and along the coastal marine area*".<sup>6</sup> The Project, with its numerous recreation and tourism benefits, aligns with the intent of Objective 8 of the Wellington RPS. In terms of the PNRP, the Shared Path maintains and enhances the recreational values of the coastal marine area ("**CMA**"),<sup>7</sup> while beach nourishment and access over the seawall maintains the existing recreational values of the CMA while also enhancing public access to and along the CMA.
20. Adverse effects on existing recreation will be no more than minor considering the mitigation proposed: minimising encroachment onto beaches where possible via sections of 2.5m path width, and beach nourishment. Formed steps and ramps across the seawall maintain appropriate levels of coastal access.
21. The Shared Path will result in a significant increase in physical recreation uptake in the Eastern Bays community. These benefits are in addition to those economic and environmental outcomes associated with changes in transport patterns.
22. The Shared Path will form part of the Remutaka Cycle Trail, and also provide a stand-alone visitor experience. This will increase the level of patronage on the Trail, and extend the time that visitors spend in the region. It will also add to the smorgasbord of visitor experiences available in the Wellington region.
23. Submissions are overwhelmingly in support of the Project from a recreation, tourism and transport perspective. However, several submitters raise issues

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<sup>6</sup> NZCPS, Policy 19(1).

<sup>7</sup> PNRP (Decisions Version), Objective O9.

relating to potential conflicts between users of the Shared Path, path width and access to beaches.

24. Recreation providers are seldom in a position to develop multiple alternative settings for exclusive use by one activity type, and so shared use will generally be the default. I see no reason to exclude cyclists from the Shared Path, although managers will need to maintain oversight of conflict levels on the path, and respond over time with, for example, appropriate education programmes, signs, design modifications, rules enforcement and ambassador projects. These are normal recreation management interventions and do not require consent controls.
25. Preferences of between 2.5m and 3.5m path widths were identified during consultation. The recommended path widths of 2.5m and 3.5m are therefore carefully considered compromises. They meet minimum standards for width but lack a wide buffer from the path edges, and therefore will influence slower travel than would occur on a path with much wider borders. With these compromises, I remain of the opinion that the Project is an effective cycling and walking solution for the Eastern Bays.
26. The seawall will result in the creation of more formal access points at specific locations (compared with the current informal accesses) and will provide for improved access along all coastal areas via the Shared Path. The Project will not result in any more than minor change to people's ability to use the coast seaward of the seawall.
27. The GWRC section 42A report considered: public access and amenity via reviews of path width and design features, public access to the coast, effects on existing recreation activities, and loss of high tide beach areas and beach nourishment. While the GWRC officer deferred to the HCC section 42A report's assessment of path width and design features, the GWRC officer found that the effects of the Project on recreation amenity will be no more than minor, subject to the successful implementation of beach nourishment.
28. The HCC section 42A report noted that the positive effects of the Project are not in dispute, and focused on the proposed path width, design features giving access to the coast (such as boat ramps), and beach nourishment. Two peer reviews considered path width. Ms Catherine Hamilton preferred a minimum 3.5m width for the full Shared Path to maximise recreation amenity, while Mr David Wanty found that sections of 2.5m width (nominally 2.4m considering rails and barriers) were acceptable from a safety perspective. The HCC officer found the proposed mix of widths an acceptable compromise. The HCC officer also found that the Project maintains access



to the beaches and CMA, and agreed that, with beach nourishment, adverse effects on recreation amenity will be no more than minor.

## **OVERVIEW OF EXISTING RECREATION, TOURISM AND AMENITY VALUES**

29. The Eastern Bays in the study area are mostly of local recreation value. The bays are predominantly used by local residents for swimming, small boat launching, walking and dog walking. Some shellfishing occurs with a little set-netting by locals offshore, and some floundering in Lowry Bay. Swimming rafts are moored offshore in summer in Lowry, Days<sup>8</sup> and Mahina Bays, and are mostly used by locals. All rocky areas provide snorkelling and fishing opportunities. A lack of visitor parking and poor coastal access inhibits use of most of the bays by visitors. The exceptions are:
- (a) Point Howard Beach, which has relatively good parking, a safe, sandy beach, and a toilet and changing shed nearby. The beach has regional value and is used mostly by residents of the Hutt Valley and Wainuiomata. It appears that residents from further afield are more likely to keep driving to Days Bay or Eastbourne; and
  - (b) the Ferry Road headland at the southern end of Sunshine Bay and the revetment at the western corner of Whiorau Reserve, which are regionally popular coastal fishing sites.
30. In addition, some regional-level shellfish harvesting occurs along the rocky parts of the study area, and in the sands below low tide in Lowry Bay. This causes issues for some locals in terms of the scale of harvesting carried out by visitors to the area, and particularly the extensive removal of molluscs from the rocky shoreline.
31. While I do not have up-to-date data to quantify the existing domestic and international tourism values of the study area, I expect it to be quite low beyond Days Bay considering the current condition of the road shoulder north of Days Bay. However, as I identify in my technical report,<sup>9</sup> the Shared Path has been an expectation of regional recreation and tourism planning for more than a decade. The Great Harbour Way / Te Aranui o Pōneke and the Remutaka Cycle Trail are significant tourism assets (the former in development). Most of the users of those routes will be New Zealanders – considering my review of available data in my technical report – but perhaps as many as 15% could be international visitors.<sup>10</sup> COVID-19 appears to have given domestic cycle tourism a significant boost, and I expect that high demand for cycleways and shared paths will remain post-COVID if the current national trends continue for a very high uptake in cycling participation.

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<sup>8</sup> Which is outside of the Project area.

<sup>9</sup> See Appendix K to the AEE at sections 3.7 and 7.3.

<sup>10</sup> See Appendix K to the AEE at section 7.3. 20% of revenue on the Remutaka Trail in 2015 was estimated to be from international visitors, and in the same year, 13.5% of users of the NZ Cycle Trail network were estimated to be international visitors.

## RECREATION AND TOURISM BENEFITS

32. In my technical report I summarise a literature review of published material which describes the benefits to community well-being provided by active recreation opportunities, such as shared paths. These well-being benefits are substantial. The key points from my literature review include:
- (a) There is overwhelming evidence that physical activity uptake has considerable benefits in injury prevention and in the reduction of harm from high cholesterol, depression, loss of bone mass, blood pressure, obesity and metabolic syndrome (a cluster of conditions which increase the risks of type 2 diabetes, stroke and heart disease). An average of 30 minutes of exercise per day provides some health benefits, but children and youth 5-17 years of age should accumulate an average of at least 60 minutes per day and up to several hours of at least moderate intensity physical activity per week.<sup>11</sup>
  - (b) A 2012 study identified that in New Zealand, physical inactivity is third only to smoking and diet as a modifiable risk factor for poor health, associated with 9.5% of all deaths and estimated to account for over 2,600 deaths per year.<sup>12</sup>
  - (c) A 2013 study identified that physical inactivity cost New Zealand \$1.3 billion in 2010 (just less than 1% of New Zealand's GDP), including on a regional basis, \$141 million for the Wellington region.<sup>13</sup>
  - (d) A 2016 benefit cost ratio analysis of the New Plymouth Coastal Walkway – a 12.7km coastal path from central New Plymouth to Bell Block Beach in the north – and an associated 'Let's Go' activation programme, were assessed to have resulted in a benefit cost ratio of 3.8, considering only transport benefits (with a net present value of \$71.4 million made up of \$97.3 million in benefits and \$25.9 million in costs).<sup>14</sup>
  - (e) 2017 Active NZ Surveys identified that walking, running or jogging and cycling are three of the nation's most common forms of physical activity, with walking being number one, and running or jogging number two.<sup>15</sup>
  - (f) Providing 'Activity Friendly Environments' – where a community has the option of recreation or active commuting in an attractive, safe and accessible setting – is considered a significant contributor to physical activity uptake.<sup>16</sup>

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<sup>11</sup> See Appendix K to the AEE at section 7.1.

<sup>12</sup> See Appendix K to the AEE at section 7.1.

<sup>13</sup> See Appendix K to the AEE at section 7.1.

<sup>14</sup> See Appendix K to the AEE at section 7.1.

<sup>15</sup> See Appendix K to the AEE at section 4.1 and Figure 11.

<sup>16</sup> See Appendix K to the AEE at section 7.2.

- (g) The Capital and Coast District Health Board ("**CCDHB**") reported in its *2015: Health Needs Assessment for Wairarapa, Hutt Valley and Capital & Coast District Health Boards*:<sup>17</sup>

*"Physical activity helps protect against heart disease, stroke, type two diabetes, certain cancers, osteoporosis and depression. It is also important for maintaining a healthy weight and preventing and reducing obesity. The Ministry of Health recommends that adults do at least 30 minutes of moderate-intensity physical activity (eg, brisk walking) at least five days per week...."*

*Just under half of all adults in the sub-region (47%) were physically active. This was similar to the rate in 2006/07 and somewhat lower than the overall New Zealand figure (54%). CCDHB adults were significantly less likely to be physically active (45%) than New Zealand adults overall."*

- (h) The World Health Organization has estimated that changes to the urban environment could reduce physical inactivity by one third.<sup>18</sup>
- (i) The Ministry for Business, Innovation and Employment estimated that the Remutaka Cycle Trail generated \$2.62 million in domestic revenue, and \$683,384 in international revenue, based on just under 99,000 visits in 2015.<sup>19</sup>
- (j) Activity Friendly Environments<sup>20</sup> provide significant advantages for people with disabilities.
33. In summary, and while this review does not represent a non-market economic analysis of the benefits of the Project,<sup>21</sup> it is important to recognise the significant gains to be made from providing an Activity Friendly Environment in the Eastern Bays, considering the very poor level of service currently in place for the most important forms of active outdoor recreation in New Zealand (including walking, running and cycling). The Shared Path will, in my opinion, result in a significant increase in physical recreation uptake in the Eastern Bays community, with most members of the community able to participate, and will provide a wide range of physical and mental health benefits. These benefits are in addition to those economic and environmental outcomes associated with changes in transport patterns.
34. It is difficult to identify the scale by which the Shared Path will change tourism patterns in Wellington and the Hutt Valley. The Shared Path will form part of the Remutaka Cycle Trail, which has an established reputation and had an

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<sup>17</sup> Rebecca Rippon *2015: Health Needs Assessment for Wairarapa, Hutt Valley and Capital & Coast District Health Boards* (Service integration and Development Unit, Wairarapa, Hutt Valley and Capital & Coast District Health Boards, 2015) at 49. See Appendix K to the AEE at section 7.1.

<sup>18</sup> See Appendix K to the AEE at section 7.2.

<sup>19</sup> See Appendix K to the AEE at section 7.3.

<sup>20</sup> See Appendix K to the AEE at section 7.2. Activity Friendly Environments are defined as allowing "people to take the active option first. Activity Friendly Environment infrastructure, settings and services allow and encourage people of all ages and abilities to make an active choice."

<sup>21</sup> See the evidence of **Michael Copeland** (economics).

estimated \$3.3 million in generated domestic and international tourism revenue in 2015.<sup>22</sup> In that same year, the Ministry of Business, Innovation & Employment identified that for every dollar spent on the NZ Cycle Trails nationally, \$3.55 of annual economic and social benefits were generated (not including value from commuting).<sup>23</sup>

35. At worst, the Shared Path will just extend the distance that existing users are able to ride on the Remutaka Cycle Trail, but I expect that it will lead to an enhanced reputation of the Trail as it develops into a complete circuit. This will serve to increase the level of patronage on the Trail, and extend the time that visitors spend in the region – similarly it will contribute to the Great Harbour Way / Te Aranui o Pōneke. But more importantly, in my opinion, it will add to the smorgasbord of visitor experiences available in the Wellington region. All destinations need a critical mass of activities and attractions to sustain their tourism profile. The more diverse the offering, the more sustainable the market. Cycling is now a fundamental visitor opportunity, particularly for domestic tourists, and walking is the mainstay of tourism generally (consistently the number one activity undertaken by international tourists<sup>24</sup>).
36. I have not attempted to quantify the potential number of visitors who are likely to use the Shared Path, and whether they are likely to be domestic or of international origin. I refer to the projected walking and cycle patronage figures used in the *Transport Assessment*<sup>25</sup> in my response to submissions below. However, these figures do not appear to include provision for tourists (and are based on local and regional patronage), and I would expect that at certain times of the year (school holidays particularly) the Shared Path will show a significant percentage of use by people from outside the Wellington region. The *Transport Assessment* is therefore conservative in this respect.

## **POTENTIAL EFFECTS OF THE PROJECT AND STEPS TO ADDRESS POTENTIAL ADVERSE EFFECTS**

### **Introduction**

37. Putting aside the obvious recreational and tourism benefits of the Project, as discussed above, the key recreation and tourism issues resulting from the Project are as follows:
- (a) minimising adverse effects on existing recreation opportunities along the Eastern Bays coast, particularly at the beaches in the study area;

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<sup>22</sup> See Appendix K to the AEE at section 7.3.

<sup>23</sup> Matilde Figuracion *Ngā Haerenga NZ Cycle Trail Evaluation Report 2016* (Ministry of Business, Innovation & Employment, 2016) at 25 (section 5.1).

<sup>24</sup> Stats NZ "International Visitor Survey: Activities" based on Ministry of Business, Innovation & Employment International Visitor Survey data, 2010 to 2019.

<<http://nzdotstat.stats.govt.nz/wbos/Index.aspx?DataSetCode=TABLECODE7576>>

<sup>25</sup> Appendix L to the AEE.

- (b) ensuring that the width of the Shared Path is suitable for the likely user groups, considering the site constraints; and
  - (c) ensuring that the Project aligns with the NZCPS and other regional planning and policy documents in relation to recreation values.
38. The Eastern Bays setting is a challenging one for the development of a shared path, considering the desire to maximise utility for path users while maintaining coastal recreation and ecological values, and considering the naturally confined nature of the Eastern Bays roadside. In my opinion, and as discussed below, the Project addresses the necessary compromises well. While the path width would ideally be greater, this is not possible considering beach amenity and ecological values, and it still results in an effective walking and cycling route.
39. Demand for the Project is also very high (as expressed in consultation and via submissions), and, in my opinion, its construction will result in significant changes to how Eastern Bays residents commute, participate in recreational activities, and will benefit residents regionally via the development of a new and attractive walking and cycling destination. The Project will not be conflict free – this is not possible in any shared setting – but standard recreation management tools (such as signs, education, rules, enforcement and design features) will be applied and modified over time to address changing use patterns. By providing for access to and along the CMA, and maintaining existing coastal recreation values, the Project matches the expectations of relevant policies for recreation and coastal access. The net benefit of the Project for recreation will be positive and substantial. I discuss the Project's effects and mitigation measures below, and the benefits are discussed above.

### **Construction**

40. Construction processes are described in the evidence of **Mr Povall**. Mr Povall notes that construction will be staged, and standard traffic management processes will be applied. In my opinion, avoiding adverse effects on coastal recreation adjacent to construction sites will be difficult due to the confined setting. However, the construction effects will be temporary and will result in a significant community asset. The conditions appended to the evidence of **Caroline van Halderen** propose mitigation measures to minimise effects on the natural values, including the preparation of a Construction and Environmental Management Plan ("**CEMP**") which will include measures to, amongst other things, minimise the effects of construction on road users and the community.<sup>26</sup> In my opinion, additional mitigation specific to recreation amenity is not required.

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<sup>26</sup> See for example conditions GC.6 – GC.7 (CEMP), GC.14 (construction noise), EM.13 – EM.18 (beach nourishment and monitoring).

## Operation

41. **Table 1** in **Appendix A** of my evidence summarises the effects of the Project on existing coastal recreation values by location, considering the activities associated with the Project, their location and scale of effect, and the proposed mitigation. Effects on beaches are scaled depending on the time that an area of 'dry' beach is accessible, where there is no high tide beach, and the scale of high tide beach in relevant areas. Effects mostly relate to the potential loss of high tide beaches due to encroachment by the Shared Path and loss of beach width generally.
42. There are no adverse effects and no mitigation required at Point Howard, Whiorau Reserve and at Windy Point.
43. I agree with the need for path widths of 2.5m at Sorrento Bay, Mahina Bay, Lowry Bay and Sunshine Bay to minimise the potential for beach loss and to ensure adverse effects on existing activities are less than minor. However, in the other bays in the study area (where there is not a need to compromise in order to address other environmental issues), 3.5m is the preferred minimum width. This is consistent with national and international standards and will help ensure that the Shared Path operates as a commuter route with minimal levels of user conflict, and maximum safety levels considering the local constraints.<sup>27</sup>
44. I have recommended beach nourishment at Point Howard Beach, Lowry Bay and York Bay where there are relatively high levels of beach use. A Beach Nourishment Plan forms part of the proposed consent conditions, with monitoring requirements.<sup>28</sup> From a recreation and amenity perspective, I consider the Beach Nourishment Plan conditions to be appropriate.

## Cumulative effects

45. Cumulative effects include those which may exacerbate effects of already consented activities in the same environment which may not have been undertaken, or which increase the scale, intensity or rate of existing environmental changes.
46. Relevant proposals are improvements to the regional cycle network, such as the Te Ara Tupua – Ngā Ūranga ki Pito-One shared path (which I am working on), and other shared path developments proposed by the HCC.<sup>29</sup> These other projects reinforce the value of the Shared Path and will enhance its connectivity and level of use. This connectivity is addressed in the evidence of **Simon Cager** and **Ihakara Puketapu-Dentice**. From a recreation

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<sup>27</sup> See Appendix K to the AEE at section 2. See, for example, Austroads *Cycling Aspects of Austroads Guides* (3<sup>rd</sup> ed, Austroads Incorporated, Sydney, 2017); *Traffic Engineering Manual Volume 3 – Additional Network Standards & Guidelines Guidance on Bicycle and Pedestrian Treatments at Roundabouts* (1<sup>st</sup> ed, Vic Roads, 2016); *Pedestrian planning and design guide – The Design of the Pedestrian Network* (Waka Kotahi NZ Transport Agency, Wellington, 2009).

<sup>28</sup> See proposed conditions EM.13 – EM.18.

<sup>29</sup> See Appendix K to the AEE at section 3.4.2 and page ES-2 (Figure ES-1) in the AEE.

perspective these projects together will provide a significant improvement in how people travel around the harbour and connect with it.

47. In terms of the existing environment, the beaches along the Eastern Bays – particularly in the study area – have been altered significantly over time by roading and the periodic construction of seawalls, most of which follow no consistent form or style, and are in variable condition. The Project will result in a more consistent treatment of the coastal edge, resulting in any long term adverse effects on visual amenity being considered low to very low, and any effects at a local scale and on a bay-by-bay basis being either very low or even beneficial (see the evidence of **Ms Williams**).
48. For beach amenity, my assessment uses – as its 'baseline' for assessing effects:
  - (a) the status quo (ie the receiving environment as it currently exists); plus
  - (b) the ongoing effects on the status quo of sea level rise and inevitable compromises to beach recreation if Marine Drive remains in place.
49. Those ongoing effects in (b) are relevant in determining the baseline because the size of the beaches, and the period when 'dry' beach and rocks are available between tides, will reduce over time if the road does not retreat or beach nourishment does not occur. The period of availability of 'dry' beach areas will also inevitably be finite – with or without the Project – as sea levels rise.
50. The Project will increase the speed with which the width of available beach is lost, due to the encroachment of Project structures on previously sandy or rocky coastline. I have recommended measures for managing effects on beaches where areas of 'dry' high tide beach normally exist and are used for sitting and sunbathing – Point Howard, the southern end of Lowry Bay and York Bay – and these are addressed in the conditions via beach nourishment. I also understand HCC is undertaking long-term work on resilience planning to address ongoing changes in recreation amenity along the Eastern Bays (in accordance with the Ministry for the Environment's 2017 *Coastal hazards and climate change: Guidance for local government*); however this is a separate programme of work to the Project and is therefore beyond the scope of my assessment in this brief of evidence.

## **NATIONAL AND REGIONAL PLANS AND POLICY DOCUMENTS**

### **NZCPS**

51. Objective 4 of the NZCPS aims to *"maintain and enhance the public open space qualities and recreation opportunities of the coastal environment by:*
  - *recognising that the coastal marine area is an extensive area of public space for the public to use and enjoy;*

- *maintaining and enhancing public walking access to and along the coastal marine area without charge, and where there are exceptional reasons that mean this is not practicable providing alternative linking access close to the coastal marine area; and*
- *recognising the potential for coastal processes, including those likely to be affected by climate change, to restrict access to the coastal environment and the need to ensure that public access is maintained even when the coastal marine area advances inland."*

52. Policy 18 of the NZCPS relates to public open space, as follows:

*"Recognise the need for public open space within and adjacent to the coastal marine area, for public use and appreciation including active and passive recreation, and provide for such public open space, including by:*

- (a) ensuring that the location and treatment of public open space is compatible with the natural character, natural features and landscapes, and amenity values of the coastal environment;*
- (b) taking account of future need for public open space within and adjacent to the coastal marine area, including in and close to cities, towns and other settlements;*
- (c) maintaining and enhancing walking access linkages between public open space areas in the coastal environment;*
- (d) considering the likely impact of coastal processes and climate change so as not to compromise the ability of future generations to have access to public open space; and*
- (e) recognising the important role that esplanade reserves and strips can have in contributing to meeting public open space needs."*

53. Policy 19 of the NZCPS relates to walking access, as follows:

- (1) Recognise the public expectation of and need for walking access to and along the coast that is practical, free of charge and safe for pedestrian use.*
- (2) Maintain and enhance public walking access to, along and adjacent to the coastal marine area, including by:*
  - (a) identifying how information on where the public have walking access will be made publicly available;*
  - (b) avoiding, remedying or mitigating any loss of public walking access resulting from subdivision, use, or development; and*



- (c) *identifying opportunities to enhance or restore public walking access, for example where:*
  - (i) *connections between existing public areas can be provided; or*
  - (ii) *improving access would promote outdoor recreation; or*
  - (iii) *physical access for people with disabilities is desirable; or*
  - (iv) *the long-term availability of public access is threatened by erosion or sea level rise; or*
  - (v) *access to areas or sites of historic or cultural significance is important; or*
  - (vi) *subdivision, use, or development of land adjacent to the coastal marine area has reduced public access, or has the potential to do so.*

54. There is clear congruence between the Project and the recreation provisions of the NZCPS. The Project is an enhancement to "*access to and along the coastal marine area*"<sup>60</sup> and most likely quite a significant one at the local and regional levels, as well as at the national level, by linking the Eastern Bays with the Remutaka Cycle Trail, one of the 22 "Great Rides" that make up Ngā Haerenga (the New Zealand Cycle Trail). The Shared Path provides for people of all abilities, and the Project effectively links many areas of public space, inland as well as coastal.

### **Wellington RPS**

55. As identified in section 3.3.1 of my technical report, the Wellington RPS identifies the coastal environment as being "*important to the regional community for recreation and general enjoyment*" and aims to support the NZCPS. Recreation values are managed via Objective 8 of the Wellington RPS<sup>31</sup> whereas amenity values more generally are considered via policies to manage other effects.

56. The Project, with its numerous recreation and tourism benefits, aligns with the intent of Objective 8 of the Wellington RPS.

### **RCP**

57. The RCP is less specific about managing recreation amenity effects than the PNRP (addressed below). Like the NZCPS, the relevant components of the RCP are concerned with access along and within the CMA and general recreational use of the foreshore, seabed, and other related parts of the CMA.<sup>32</sup> However, as discussed at paragraph 3.3.2 of my technical report, as

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<sup>30</sup> NZCPS, Policy 19(1).

<sup>31</sup> Wellington RPS, Objective 8: Public access to and along the coastal marine area, lakes and rivers is enhanced (objective 8 is shared for the coastal environment and fresh water).

<sup>32</sup> RCP, section 2.4.4.

a general objective the RCP seeks to ensure that *"amenity values in the coastal marine area are maintained and enhanced"*.<sup>33</sup> In my view the Shared Path will, from a recreation perspective, enhance existing amenity values, and via beach nourishment at certain beaches and access provisions over the seawall, the Project will maintain existing coastal recreation opportunities.

## **PNRP**

58. Since preparing my technical report in January 2019, the Decisions Version of the PNRP has been released.<sup>34</sup> Accordingly, I have reviewed the relevant provisions of the PNRP (Decisions Version) in light of the Project and my assessment is appended to this evidence as **Appendix C**. As a general observation, my assessment is that the Shared Path maintains and enhances the recreational values of the CMA,<sup>35</sup> while beach nourishment and access over the seawall maintains the existing recreational values of the CMA while also enhancing public access to and along the CMA.<sup>36</sup>
59. Beach access is provided over the proposed seawalls at strategic and regular points, at all beaches and at several sections of rocky coast. Sections of single-curved seawall will be easily stepped over, and short sections of revetment similarly so. Appendix J to the AEE (*Design Features*) details the coastal access options for the sections of seawall which are double- or triple-curved. Generally, a minimum of two accesses are provided for at each beach. Ramps are maintained or provided anew at Point Howard Beach, Whiorau Reserve (immediately south of Lowry Bay), York Bay and Mahina Bay. Steps are proposed to be built parallel to the Shared Path, and will create sitting and 'hanging-out' space off the path. They intrude further into the coastal environment than the seawall, but less so than perpendicular stairs, and are essential assets.
60. By addressing adverse effects on those beaches with 'dry' high tide areas used for sitting and other 'dry' beach activities, the Project will maintain coastal amenity and ensure effects are no more than minor. Losses in the width of beach – where nourishment is not proposed – and at rocky areas, are minimised by relying on a narrowed path width where appropriate, and may be addressed through future coastal resilience planning if they are regarded as priorities. The Project responds to climate change, as much as it can, as a combined resilience and transport project.

## **CONCLUSION ON EFFECTS**

61. Adverse effects on existing recreation will be no more than minor considering the mitigation proposed – minimising encroachment onto beaches where

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<sup>33</sup> RCP, section 4.1.9.

<sup>34</sup> On 31 July 2019.

<sup>35</sup> PNRP (Decisions Version), Objective O9.

<sup>36</sup> PNRP (Decisions Version), Objectives O9 and O10.

possible via sections of 2.5m path width, and beach nourishment at certain beaches.

## **RESPONSE TO SUBMISSIONS**

62. I note that the submissions are overwhelmingly in support of the Project from a recreation, tourism and transport perspective.<sup>37</sup> The key themes in those submissions are that the Project will encourage and increase recreation (and the associated health benefits) by providing a stand-alone resource, as well as links to new recreation opportunities –such as the Remutaka Cycle Trail and Great Harbour Way / Te Aranui o Pōneke – and better access to existing recreational facilities in the area, including the beaches. Only 11 submissions in opposition that relate to any or all of recreation, amenity, tourism and transport were received, and these are dealt with below.

### **Potential conflict between cyclists and Shared Path users**

63. Nigel Oxley (84) (opposed) has concerns regarding conflict between cyclists and walkers on the Shared Path considering speed differences and the risk of collision, and Geoffrey Rashbrooke (179) (opposed) has concerns about excessive speed of cyclists on the Shared Path particularly near bus stops. John Gibb (85) (opposed) opines that the 3.5m width is insufficient to accommodate the different user groups. Hugh Walcott (180) (supporting) endorses the 3.5m width for safety reasons. Judith Lawrence (177) (neutral) has concerns about the compatibility of walkers and cyclists on the Shared Path. Te Aranui o Pōneke, The Great Harbour Way Trust (159) (support) urges consideration of the wide range of different user groups likely to use the Shared Path. Other submitters have similar concerns but refer specifically to path width, and I address these below.
64. Commuting cyclists travelling at speed will remain road users with the Shared Path in place as it will not be suitable for high speed biking, considering the likely mix of users.<sup>38</sup> Other cyclists will use the Shared Path at the same time as walkers, and this can lead to some conflict. For example, my 2016 survey for the GWRC of 960 users of the Hutt River Corridor<sup>39</sup> – the majority of whom were users of the shared paths beside the River (mostly less than 2m wide, but some sections up to 3m wide) – identified that 87% of respondents' interactions with other users of the setting were positive (they enjoyed encountering other users), 9% of experiences were neutral, and 4% were negative. Those visiting the corridor with a dog had the most negative interactions by count, and cyclists were described as the main cause (15 of the 33 negative interactions – out of 2173 reported interactions). Cyclists

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<sup>37</sup> 179 submissions (out of a total of 200 received) were in support (with a further one in conditional support). Of those (noting each submission included reference to one or more factor, and based on a key word summary of submission themes), 155 referenced safety for users, 33 referenced health benefits, 42 referenced amenity generally, 30 referenced connectivity and 33 tourism.

<sup>38</sup> Submitter Jo Cullhane (53) (support) suggests that the option of road cycling should be removed with the Shared Path in place, but this would only increase conflict on the Shared Path.

<sup>39</sup> Available at [http://www.gwrc.govt.nz/assets/council-reports/Report\\_PDFs/2016.258a1.pdf](http://www.gwrc.govt.nz/assets/council-reports/Report_PDFs/2016.258a1.pdf).

were also the main cause of negative interactions with walkers (9 of 20 negative interactions). Reasons for negative interactions with cyclists were largely associated with comments like 'too fast', 'dominate path', 'no warning of approach'. Dog walkers with dogs on leads can have their leads spanning a walkway of almost any width, while dogs off-lead on shared paths can turn in front of moving cyclists or just behave unpredictably.

65. However, such potential conflicts are not a reason to remove cyclists from the mix (noting that respondent users of the Hutt River Corridor were far more likely to have positive interactions with cyclists than negative, and the number of negative interactions were few). In all recreation settings, managing conflict is an exercise in education and setting the right expectations, as well as providing a facility appropriate to its expected uses. Recreation providers are seldom in a position to develop multiple alternative settings for exclusive use by one activity type, and so shared use will generally be the default.<sup>40</sup>
66. I see no reason to exclude cyclists from the Shared Path, but would expect recreation managers to monitor conflict over time and to implement appropriate education programmes as required (via, for example, signs, media campaigns and on-site ambassadors, and enforcement).
67. Te Aranui o Pōneke, The Great Harbour Way Trust (159) (support) suggests design and signage to encourage users on bikes and scooters who want to travel faster to access the road. I expect that fast commuter riders will rely on the road due to the confines of the Shared Path. However, codifying such provisions can evolve over time, and do not need to be set in stone immediately. Signs and subtle design changes are a normal part of ongoing conflict and safety management in any shared use setting. While the Project cannot define how the adjacent road is managed, I expect that future decisions about the road's control and development will respond to the influence of the Shared Path.

### **Path width**

68. Roger Brown (162) (opposed) suggests that the proposed width is excessive, while Ruth Gilbert (163) (neutral) suggests that a width of 2m to 2.5m is adequate for the existing walking and cycling users. Morgan Sissons (174) and Margaret Sissons (175) (opposed) seek a 2.5m to 3m path width to reduce effects on beaches. Terence Pinfold (167) (supporting) seeks a 2.5m wide path at the southern end of York Bay to reduce effects on the beach. Carol Lough (173) (supporting) suggests that a 2.5m path will encroach excessively on York Bay, and Bruhlmann Gertrud (190) (opposed) considers the existing path at York Bay to be too wide. Richmond Atkinson (168)

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<sup>40</sup> Although, in the East Harbour Regional Park, which has walking connections to the proposed Shared Path in Lowry Bay, York Bay, at Windy Point and in Days Bay, there are multiple walking-only tracks, which provide a dedicated setting for those seeking fewer interactions with other visitors.

(opposed) considers that the path will be insufficiently wide to cater for e-bikes and e-scooters.

69. Michael Sheridan (66) – in opposing the application and seeking a 'low cost option' with cyclists on-road – states that the estimate of future use of the pathway is poorly detailed and refers to Australian standards for use and path widths. I have referred to these standards in my technical report and include the key components in **Appendix B** to this evidence. However, it is worth reiterating as it also addresses other submitters' concerns over the options of 2.5m and 3.5m widths for the Shared Path.
70. **Mr Povall's** evidence, and the *Transport Assessment* (Appendix L to the AEE), refer to an estimate of 180 new users by relying on the Waka Kotahi Economic Evaluation Manual.<sup>41</sup> The estimate is made up of 60 new pedestrians per day and 120 new cyclists. Cyclists were expected to use most of the length of the path, while walkers were assumed to travel approximately 2km, so the count of 60 new pedestrians does not represent that level of growth on all sections of the path (for example, walkers coming off the Days Bay Ferry are unlikely to all walk as far as Point Howard). Baselines for existing cyclists were established via counts at 77 per day, and at 100 for walkers. Factoring the count for cyclists, based on established methodologies for adjusting tube count data for season, day of week and established under-recording from tube counters, gave a base figure of 110 for cyclists. This gives a daily use figure for year one of the Shared Path of 230 cyclists and 160 walkers per day (noting again that walkers passing any one point would not reach this count).<sup>42</sup> Some of this activity could be quite 'peaky' with high use during the morning and afternoon school and work commutes.
71. **Figures 1 and 2 in Appendix B** show the Austroads recommendations for path width for shared and separated walking and cycle paths depending on patronage levels, with 50/50 and 75/25 directional splits respectively. The 75/25 split would occur when many users are heading in the same direction during the morning or afternoon commute. The minimum recommended width for any shared path is 2.5m. A path width of 3m with a 50/50 directional split allows for – at the point of downward inflection in the charted curve – approximately 90 two-way pedestrians at peak hour and approximately 300 two-way cyclists at peak hour. This exceeds likely patronage levels for the Shared Path (considering also extra provision for tourists); with the projected level of use of the Shared Path over a day close to the Austroads standard for an hour – although minimum standards for path width mean that the proposed width cannot be reduced (which I discuss below). This means there is adequate scope for substantial growth in use, and accommodation if the patronage assessment is conservative.

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<sup>41</sup> See Appendix L to the AEE at section 4.3.

<sup>42</sup> See Appendix L to the AEE at Table 4-2.

72. The projection for use of the Shared Path is similar to existing patronage levels for the Wainuiomata Hill Shared Path.<sup>43</sup>
73. Waka Kotahi's *Pedestrian planning and design guide* (NZTA 2009) uses the same standards as Austroads and notes:<sup>44</sup>
- "In both cases [segregated and unsegregated shared paths] it is important to:*
- *leave a lateral clearance distance of one metre on both sides of the path to allow for recovery by cyclists after a loss of control or swerving ...*
  - *ideally, keep a 1.5 m separation between the path and any adjacent roadway..."*
74. If the 2.5m width is used as a minimum starting point, and an additional 1m on both sides is added for cyclist recovery, this amounts to a requirement for a 4.5m path, or a 5m wide path including a road separation. This is not constructable in the Eastern Bays setting. I note that Te Aranui o Pōneke, The Great Harbour Way Trust (159) in their supporting submission would prefer a 5m path, but also note that spatial constraints limit this option.
75. Preferences of between 2.5m and 3.5m path widths were identified during consultation, with little interest in wider or narrower paths and more support for the 2.5m option, with user safety and effects on beaches the key rationales.<sup>45</sup>
76. The recommended path widths of 2.5m and 3.5m are therefore carefully considered compromises. They meet minimum standards for width but lack a wide buffer from the path edges, and therefore will influence slower travel than would occur on a path with much wider borders. While it would be ideal to have a total effective width of 4m (as recommended for Waka Kotahi's proposed Te Ara Tupua – Ngā Ūranga ki Pito-One shared path – a high-speed commuter route and shared path with a total path width of 5m), this is not possible in the Eastern Bays setting. The proposed widths are vast improvements on the current setting with its variable widths – often less than 1m – and will still influence a high level of uptake, but they will require slower passage than a route with greater width would. With these compromises, I remain of the opinion that the Project is an effective cycling and walking solution for the Eastern Bays.

### **Access to the beach**

77. The East Harbour Environmental Association Incorporated (80) (opposed) suggest that the Project will lead to more restricted access to the CMA, especially with double and triple curved seawalls. Richmond Atkinson (168)

<sup>43</sup> Kennett, S. *Ngā Ūranga ki Pito-One Shared Path Project: Shared path demand and design assessment* (Waka Kotahi, 2020) at section 6.4.1.

<sup>44</sup> *Pedestrian planning and design guide* (Waka Kotahi NZ Transport Agency, Wellington, 2009) at 14 – 20.

<sup>45</sup> See Appendix K to the AEE, section 2.

(opposed) and Geoffrey Rashbrooke (opposed) also refer to adverse effects on access to beaches as a result of the seawall.

78. While the single curved seawall at Lowry Bay will be reasonably easily stepped over, depending on the local height of the beach, sections of double and triple curved seawall will be more difficult to cross. The scale of change to casual access off the existing road shoulder will vary by location. The *Landscape and Visual Assessment*<sup>46</sup> gives a summary of the existing form of the coastal edge, with sections of pavement directly meeting the beaches in some areas (such as at Lowry Bay), and other areas of mixed concrete and rubble slope having poor standards for access.
79. The seawall will result in the creation of more formal access points at specific locations as described in the *Preliminary Design Plans*<sup>47</sup> and in the AEE, and will provide for improved access along all coastal areas via the Shared Path. The Project will not result in a more than minor change to people's ability to use the coast seaward of the seawall, considering that it will have a similar level of provision for access as does Oriental Bay Beach, which appears to suffer no handicap. The proposed level of access is another careful compromise between ecological values, coastal processes and recreation amenity.

## **RESPONSE TO COUNCIL OFFICERS' SECTION 42A REPORTS**

### **GWRC**

80. The GWRC section 42A report considered: public access and amenity via reviews of path width and design features, public access to the coast, effects on existing recreation activities, and loss of high tide beach areas and beach nourishment. While the GWRC officer deferred to the HCC section 42A report assessment of path width and design features, the GWRC officer found that the effects of the Project on recreation amenity will be no more than minor, subject to the successful implementation of beach nourishment. A consent condition was recommended requiring the consent holder to engage a suitably qualified and experienced disability auditor to prepare an accessibility statement to guide design, and undertake accessibility audits in accordance with NZS 4121 Design for Access and Mobility – Buildings and Associated Facilities as part of detailed design (section 12.2.2). Input from the disability community is important. However, I note that the applicant's proposed consent condition LV.3 already requires that the Landscape and Urban Design Plan ("**LUDP**")<sup>48</sup> be prepared with the input of a range of

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<sup>46</sup> See Appendix D to the AEE.

<sup>47</sup> See Appendix N to the AEE.

<sup>48</sup> An ecologist, engineer, landscape architect, recreation specialist, traffic engineer and urban designer.

specialists , therefore coordinating design for access and mobility within this process may be more efficient than operating a relatively isolated review.

## **HCC**

81. The HCC section 42A report noted that the positive effects of the Project are not in dispute, and focused on the proposed path width, the design features giving access to the coast (such as boat ramps) and beach nourishment. Two peer reviews considered path width. Ms Catherine Hamilton preferred a minimum 3.5m width for the full Shared Path to maximise recreation amenity, while Mr David Wanty found that sections of 2.5m path (nominally 2.4m considering rails and barriers) were acceptable from a safety perspective. The HCC officer found the proposed mix of widths acceptable.
82. Ms Hamilton's opinion in her peer review was that the sections of path width of 2.5m would mean that design standards for recreation amenity would be 'unacceptably compromised'.<sup>49</sup> The Shared Path will include 2,887m of 3.5m width, 955m of 2.5m (including 195m linking Seaview to Point Howard and Point Howard Beach) and 245m of existing path through Whiorau Reserve made a consistent 3m. An additional 170m of path will transition between 2.5 and 3.5m.<sup>50</sup> The sections of 2.5m width path will be divided across short sections at Sorrento Bay, Lowry Bay, Mahina Bay and Sunshine Bay.<sup>51</sup> These 2.5m sections are all adjacent to beach areas where, as I have stated, a compromise is necessary between encroachment into the CMA and recreation amenity on the path. A 2.5m path width meets Austroads standards for more than 500 cyclists per hour (50/50 two way).<sup>52</sup> The four short sections of 2.5m path width proposed, which are a logical outcome of necessary trade-offs, are, in my opinion, acceptable.
83. The HCC officer also found that the Project maintains access to the beaches and CMA, and agreed that, with beach nourishment, adverse effects on recreation amenity will be no more than minor.

**Robert James Greenaway**

**30 November 2020**

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<sup>49</sup> Page 3 of Appendix F to the GWRC section 42A report.

<sup>50</sup> See Appendix D to the AEE at section 5.4.

<sup>51</sup> See Appendix N to the AEE.

<sup>52</sup> See **Figure 1** in **Appendix B** to this evidence.



## APPENDIX A: SUMMARY OF PROPOSED ACTIVITIES BY AREA, ACTIVITY, SCALE AND MITIGATION

Table 1: Summary of proposed activities by area, activity, scale and mitigation			
	Activity	Effect and scale	Mitigation and net effect
<b>Point Howard</b>	Shared path constructed over road reserve, formalising roadside parking areas, tidying revetment foreshore.	Area currently used for carparking, with some use of rocky foreshore for fishing and shellfishing. No loss of amenity.	None required.
<b>Point Howard Beach</b>	Double curve seawall and 3.5m path. Beach access provided at either end of beach (steps and ramp).	Loss of beach width in regionally important recreational beach which normally features a high-tide beach. More than minor effect.	Beach nourishment recommended to ensure less than minor effect.
<b>Sorrento Bay</b>	Double curve seawall and 3.5m path, with 2.5m (to minimise beach loss) width at beach area and access steps at either end beach area.	Small loss of beach area in area used for local swimming, with some fishing and shellfishing from rocky areas. No high tide beach. Minor effect balanced by benefits from path.	2.5m wide path proposed in beach area to minimise beach loss. No mitigation required.
<b>Lowry Bay</b>	Single, double and triple curved seawall, four sets of steps, 2.5m path for short section north of boat shed to avoid adverse ecological effects on subtidal areas, and 3.5m path width otherwise.	Loss of beach width in locally important recreation beach with some regional use and normally a high-tide beach. More than minor effect south of bus stop where the majority of beach recreation occurs. No effect on shellfishing or fishing.	Beach nourishment recommended south of bus stop to ensure less than minor effect.
<b>Whiorau Reserve</b>	Shared path constructed through reserve. Extension of riprap south of reserve to near headland and pump-station. No new construction at headland.	Path location avoids conflict with boat launching activities. No disruption of fishing at headland.	None required.
<b>York Bay</b>	Double and triple curved seawall and 3.5m path with access steps and boat ramp.	Beach width loss in beach area which normally has a section of high tide beach. Relatively heavy local use for swimming and boat launching.	Beach nourishment recommended to ensure less than minor effect.
<b>Mahina Bay</b>	Double curve seawall and 2.5m (to reduce adverse ecological effects and beach loss) and 3.5m path, with boat ramp and steps at either end of beach area.	Small loss of beach area in area used for local swimming, with some fishing and shellfishing from rocky areas. Little high tide beach. Minor effect balanced by benefits from path.	2.5m wide path proposed in beach area to minimise beach loss. No mitigation required. Less than minor effect on recreation value.

**Table 1: Summary of proposed activities by area, activity, scale and mitigation**

	Activity	Effect and scale	Mitigation and net effect
<b>Sunshine Bay</b>	Double curve seawall and 2.5m (to reduce adverse ecological effects and beach loss) and 3.5m path, with boat ramp and steps at either end of beach area and three sets of steps in rocky coastal sections. Extension of revetment in the south.	Small loss of beach area in area used for local swimming, with some fishing and shellfishing from rocky areas, and popular fishing site at southern headland. Little high tide beach. Minor effect balanced by benefits from path.	2.5m wide path proposed in beach area to minimise beach loss. No mitigation required. Less than minor effect on recreation value.
<b>Windy Point</b>	Double and triple curve seawall and 3.5m path. One set of sets.	Small loss of shoreline width in little used section – some local swimming, shellfishing and fishing. Less than minor effect.	None required.

**APPENDIX B: STANDARDS FROM: AUSTRoadS, 2017. CYCLING ASPECTS OF AUSTRoadS GUIDES. AUSTRoadS INCORPORATED**

Austrroads (2017) summarises its path width models within two graphs, one for a movement scenario with a 50/50 split in directional movements (the same number of users heading in both directions) (**Figure 1**), which would be more common for a recreational route, and for a 75/25 split (**Figure 2**), which is a more likely scenario for a commuter route. The latter has more capacity at the same path style and width than the former. The Shared Path is likely to have both roles at different times of the day and week.

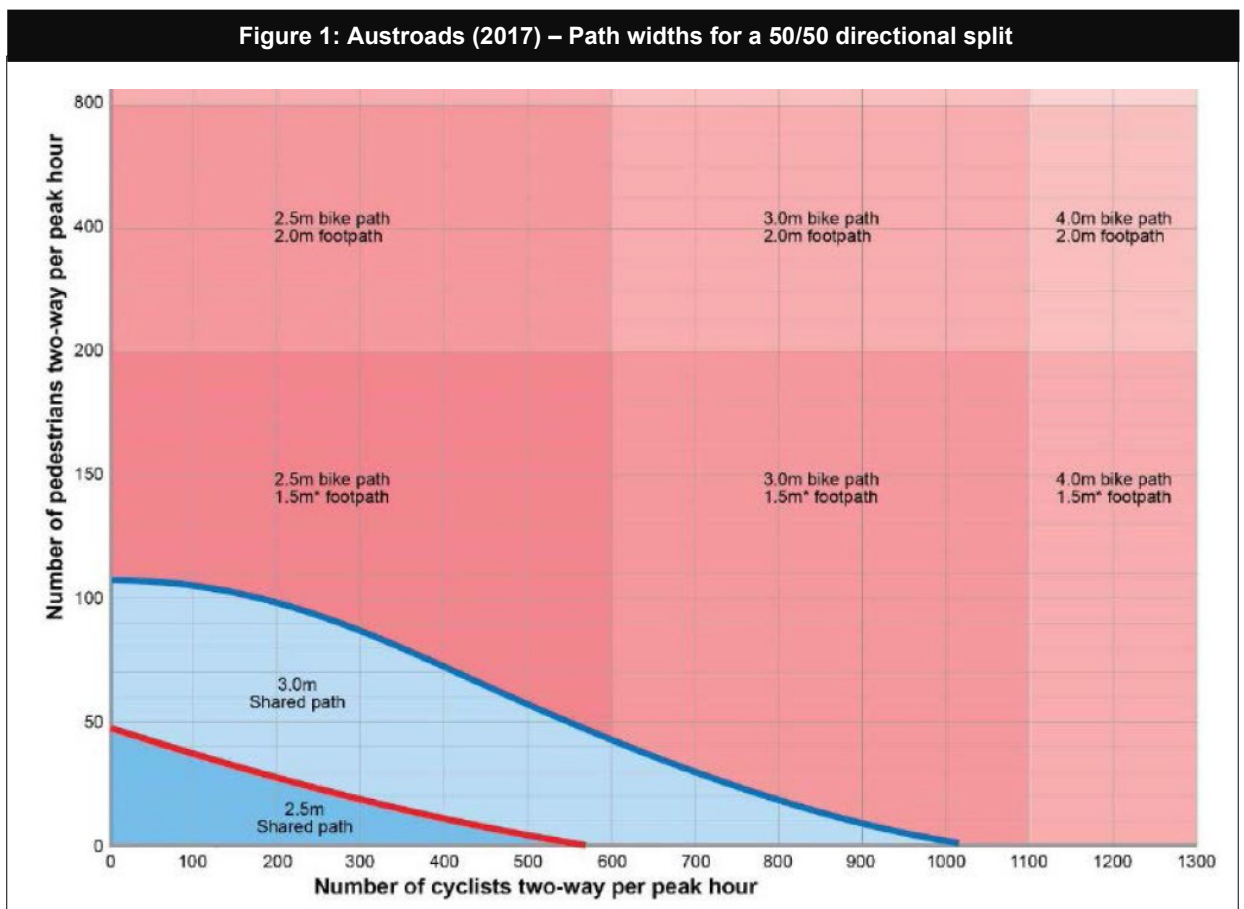
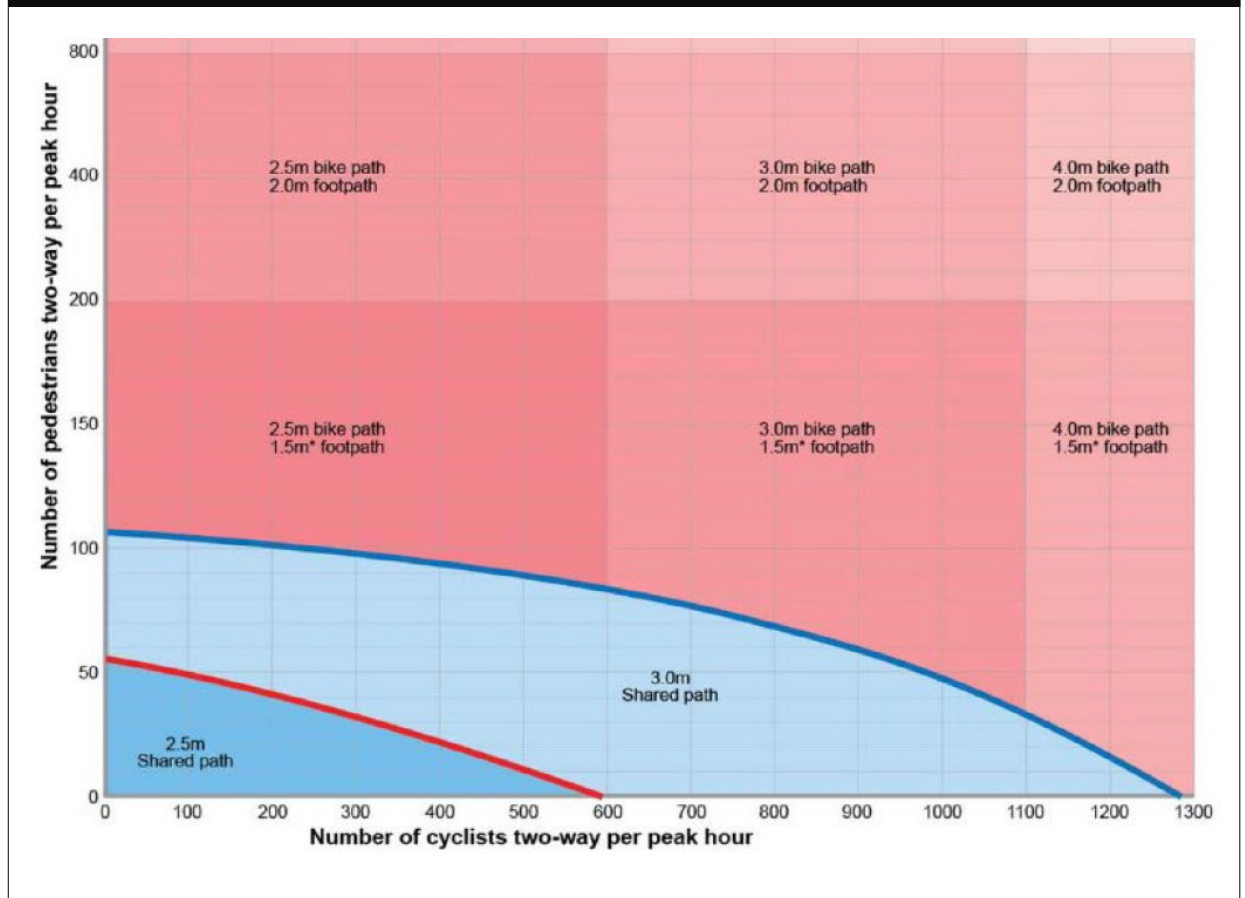


Figure 2: Austroads (2017) – Path widths for a 75/25 directional split



The Austroads (2017) width recommendations for a shared path are:

*As for bicycle paths, the upper limit of the acceptable range in the table should not discourage designers from providing a greater width where it is needed (e.g. very high demand that may also result in overtaking in both directions).*

Table 1: Austroads (2017) shared path width standards	Shared path width (m)		
	Local access path	Regional path	Recreational path
Desirable minimum width	2.5	3.0	3.5
Minimum width <sup>1</sup> – typical maximum <sup>2</sup>	2.5 – 3.0	2.5 – 4.0	3.0 – 4.0

1. A lesser width should only to be adopted where cyclist volumes and operational speeds will remain low.

2. A greater width may be required where the numbers of cyclists and pedestrians are very high or there is a high probability of conflict between users (e.g. people walking dogs, roller bladders and skaters etc.).

Waka Kotahi's *Pedestrian planning and design guide* (NZTA 2009) uses the same standards as Austroads (**Table 1**) and notes:

*In both cases [segregated and unsegregated shared paths] it is important to:*

- *leave a lateral clearance distance of one metre on both sides of the path to allow for recovery by cyclists after a loss of control or swerving ...*
- *ideally, keep a 1.5 m separation between the path and any adjacent roadway...*

Waka Kotahi adds the rider to **Table 1** where the use of the path is uncertain (ie, it is unclear if it will be a local access, commuter or recreational path). The minimum width should be 3.0m. Waka Kotahi notes:

*Shared areas: Cyclists are often excluded from pedestrian-only areas, such as malls. There can be little justification for this, as collisions between pedestrians and cyclists are comparatively rare. Nevertheless, some pedestrians do perceive a danger from cyclists due to their speed and quietness, and may feel intimidated by them. The elderly feel especially vulnerable when encountering cyclists in their walking space.*

**APPENDIX C: RECREATIONAL ASSESSMENT AGAINST THE RELEVANT PNRP (DECISIONS VERSION) PROVISIONS**

<b>Proposed Natural Resources Plan for the Wellington Region – Decisions Version (31 July 2019)</b>		
<b>Relevant objective</b>	<b>Relevant policy</b>	<b>Assessment</b>
<p>Objective O9</p> <p>The recreational values of the coastal marine area, rivers and lakes and their margins and natural wetlands are maintained and enhanced.</p>	<p>Policy P133: Recreational values</p> <p>The adverse effects of use and development in the coastal marine area on recreational values shall be managed by providing for a diverse range of recreational opportunities while avoiding conflicts and safety issues.</p>	<p>The Project will result in enhanced recreation values for the main forms of recreation in the coastal setting – walking and cycling – while access provisions in the seawall maintain access to beaches and other coastal areas. Beach nourishment and reductions in path widths maintain existing beach recreation amenity.</p>
<p>Objective O10</p> <p>Public access to and along the coastal marine area and rivers and lakes is maintained and enhanced.</p>		<p>The Project outcome will be to enhance public access to and along the CMA.</p>
<p>Objective O55</p> <p>The need for public open space in the coastal marine area is recognised.</p>	<p>Policy P134: Public open space values and visual amenity</p> <p>The adverse effects of new use and development on public open space and visual amenity viewed within, to and from the coastal marine area shall be minimised by:</p> <p>(a) having particular regard to any relevant provisions contained in any bordering territorial authorities' proposed and/or operative district plan; and</p> <p>(b) managing use and development to be of a scale, location, density and design which is compatible with the natural character, natural features and landscapes and amenity values of the coastal</p>	<p>Separate technical assessments (Appendices A-1, C-1 and D to the AEE) consider effects on ecological and landscape values which support recreation amenity. The Project focuses on "the future need for public open space in the coastal marine area" via the Shared Path itself, beach nourishment and access provisions across the seawall.</p>

	<p>environment and the functional needs, operational requirements and locational constraints, the Commercial Port Area and the Wellington International Airport,</p> <p>and (c) taking account of the future need for public open space in the coastal marine area.</p>	
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