



Report pursuant to s42A Resource Management Act 1991

In the matter of:	A Notice of Requirement to construct and operate a new intermodal rail and freight hub on land between Palmerston North and Bunnythorpe
And:	A hearing by Palmerston North City Council pursuant to s100A
Requiring Authority:	KiwiRail Holdings Ltd
Hearing date:	9 August 2021

S42A Technical Evidence: Social Impacts

Amelia Linzey

1 Executive Summary

1. It is my opinion that the methodology and approach of the KiwiRail Social Impact Assessment ("**SIA**") is appropriate.
2. However, it is my opinion that the SIA has two key limitations, resulting in an assessment that does not consider all potential adverse social impacts. The limitations are:
 - (a) The level of design input and information on which the SIA is based do not provide sufficient detail to assess potential adverse social impacts over time, particularly given uncertainty on timing and stages of development. The most significant of these is the absence of a Cultural Values Assessment which would inform the SIA; and
 - (b) The generalisation of potential adverse social impacts to the defined 'local area' obscures some impacts that may be higher for those in the community in close proximity to the proposed Freight Hub or for the Bunnythorpe community area.
3. Accordingly, I consider that there are potentially moderate and even higher adverse social impacts associated with the construction and operation (particularly potential staged operation) of the proposal. From a social perspective (and noting the absence of a cultural values assessment) I consider this risk is greatest for those who are living closest to the proposed site and are part of the Bunnythorpe community.
4. I acknowledge that further evaluation would be necessary to make detailed conclusions regarding potential adverse social impacts at these more local scales. However, I consider that such evaluation would be warranted in order to conclude that the likely potential adverse effects are low to moderate.
5. I consider that, in the absence of this more detailed assessment, an appropriate response is to include a comprehensive suite of conditions on the designation to provide Kiwirail an opportunity to engage with and respond to community concerns during implementation; particularly in respect of setting design outcomes for the development (and potentially stages of the development) in respect of the landscape and urban design processes, noise mitigation and the provision of walkways and cycleway access within the site and to/from the surrounding community (e.g. the Bunnythorpe local

community area). I consider these additional mitigation conditions are necessary to appropriately respond to the uncertain social impacts of the proposal.

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2 Introduction, Qualifications and Experience

1. My full name is Amelia Joan Linzey.
2. I have the qualification of Master of Science in Geography (First Class Honours) and Bachelor of Science from the University of Auckland. I am a full member of the New Zealand Planning Institute and a member of the International Association of Public Participation. I have undertaken the IAP2 Certificate Programme in Public Participation (2003).
3. I have prepared, or was otherwise stated, involved, in SIAs for the following projects or matters:
 - (a) Ōtaki to North of Levin Transport Corridor, Short List Options, NZ Transport Agency;
 - (b) Peer review of the Social Impact Monitoring Report for Wiri Prison, Auckland, for the Department of Corrections;
 - (c) Options for the proposed Huia Water Treatment Plant, Auckland, for Watercare;
 - (d) Advice to Whakatane District Council regarding the social impacts of potential changes to its District Plan, responding to debris flow hazards;
 - (e) East West Project (involving preparation of a Social Impact Assessment and presentation of evidence to a Board of Inquiry), for the NZ Transport Agency;
 - (f) Peer review of the SIA for the Redoubt Road – Mill Road Corridor Project for Auckland Transport, including review and development of Conditions;
 - (g) The designations for the City Rail Link for Auckland Transport, including evidence, and development and review of conditions;
 - (h) The resource consent applications to abandon the wreck of the MV Rena on the Astrolabe Reef (including presentation of hearing evidence);

- (i) The Drury South Plan Change, a private plan change initiated by Stevenson Ltd to extend te Metropolitan Urban Limit and change the zoning of rural land in Auckland (Drury) to a mix of urban land uses (including industrial and business park land);
 - (j) The Ruakura Inland Port Proposed Plan Change (2013 – 2014) including presentation of hearing evidence;
 - (k) The Waterview Connection Designations and Resource Consent for the NZ Transport Agency (2010-2011) including presentation of social impact evidence and development of conditions for mitigation and management of potential adverse social impacts;
 - (l) A review on behalf of council for the Waikeria Prison alteration to designation application, Otorohonga District Council; and
 - (m) The alteration to designation for Whakatakāpokai, a youth justice centre in urban South Auckland on behalf of Oranga Tamariki.
4. I confirm that I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2014 and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that except where I state I am relying on information provided by another party, the content of this evidence is within my area of expertise.

3 Background and Scope of Evidence

3.1 Background

5. KiwiRail is seeking to designate land for the construction and operation of a Regional Freight Hub (“**the Freight Hub**”). The site is approximately 177ha and is located in Bunnythorpe, stretching from the existing residential area in the north to the more industrial centre to the south.
6. I rely on the Assessment of Environmental Effects for a detailed description of the Project. In short, the intention is for the Freight Hub to function as a centralised hub for train operations, marshalling yards, maintenance, freight handling and storage facilities. Locomotives of up to 1.5km in length are anticipated. Mitigation measures such as noise walls, planting and stormwater ponds are proposed. KiwiRail currently operate a freight yard at Tremaine

Avenue, and activities occurring on this site will be incorporated into the new Freight Hub.

3.2 Scope of evidence

7. This statement of evidence covers the following:
 - (a) My involvement with the project to date
 - (b) The methodology I have used in my review of the KiwiRail NoR and Social Impact Assessment;
 - (c) Overarching observations about potential gaps in the information currently provided by KiwiRail;
 - (d) My conclusions as to the main positive and adverse social impacts of the project;
 - (e) A review of submissions relating to social impacts; and
 - (f) The appropriateness of current proposed mitigation measures, and any other measures I consider appropriate to address adverse effects of the project.
8. My evidence should be read in conjunction with expert evidence of the other experts that have contributed to the s42A Planning Assessment.

3.3 Involvement with the project

9. I became involved in the project in September 2020, when Palmerston North City Council engaged a number of technical specialists to assist in the processing of KiwiRail's Notice of Requirement.
10. My role has involved reviewing the Notice of Requirement and associated technical assessments, in particular the Social Impact Assessment prepared by Kirsty Austin, assisting with PNCC's s92 request, and preparing evidence to support my review.

3.4 Review Methodology

11. My methodology for the review of the NoR has consisted of the following:
 - (a) A review of the Social Impact Assessment prepared by Ms Austin;

- (b) A review of the Notice of Requirement and associated technical documents, including the Notice of Requirement Conditions (Appendix 3);
 - (c) Input into Palmerston North City Council's s92 response; my input was limited to the identification of questions relating to social impacts;
 - (d) Review of the s92 response and updated Notice of Requirement Conditions;
 - (e) A site visit to Bunnythorpe in November 2020; and
 - (f) Meetings with other technical specialists, including noise, landscape and lighting.
12. There are two key issues I focus on in respect of Kiwirail's SIA, which are relevant to the potential social effects of the proposal. The first issue relates to the level of certainty about the predicted social impact effects assessment; and the second relates to the specific potential impacts on the 'Bunnythorpe community' within the local area identified in Kiwirail's SIA, which I have mapped in Appendix A.
13. I discuss both of these issues in sections 4.1 and 4.2 below. In synopsis, my concerns are:
- (a) There are information gaps in the proposal that have made it difficult to accurately ascertain the scale of adverse potential social impacts, particularly in respect of any phasing of development of the site; and
 - (b) The SIA has taken an overly broad approach to considering potential impacts on the 'local' community, which has obscured the scale of potential adverse impacts at a sub-community or neighbour level, in particular the impacts on residents in the Bunnythorpe community.
14. In combination, I consider there is potential that there are social impacts of a greater adverse severity than what has been assessed in Kiwirail's SIA.

4 Review findings

4.1 Certainty of Assessment - Adequacy of available information

15. Kiwirail's SIA has:

- (a) provided an overview of the existing local and wider community, including population characteristics, community facilities and features of value to the community, community groups and community aspirations;¹ and
 - (b) scoped potential social impacts. I note that Kiwirail's SIA has identified several gaps or limitations in KiwiRail's provision of information which have limited the assessment (the absence of a cultural values assessment and a lighting report) and it is stated that the assessment is high-level in response to these information gaps; I agree with this approach in the absence of more detailed information in these areas.
16. However, I consider that the information available is currently insufficient to accurately assess the severity of the Freight Hub's potential social impacts and the resultant social consequences. This is a result of two key issues: firstly (and most significantly), current information gaps about the construction and operation of the hub (including potential for staged development and operation); and secondly, issues with the scale of assessment in Kiwirail's SIA (noting that these matters are partially but not sufficiently addressed in the s92 response, which I discuss in Section 4.2).
17. In my opinion there are a number of remaining gaps in the information from Kiwirail, regarding construction and operation of the Freight Hub, including:
- (a) The lack of a cultural values assessment;
 - (b) Uncertainty around the timing of construction and operation of the Freight Hub, including potential phases of development / operation of the site;
 - (c) Inconsistencies in the information about when landscaping will occur, and particularly the feasibility of mitigation works that appear to be relied on for Kiwirail's SIA;² and
 - (d) A lack of information about the Freight Hub's expected night-time activity levels, which will have associated effects such as night-time noise and potential social consequences for residents.

¹ Section 3, Social Impact Assessment (Technical Report J) – Kirsty Austin.

² I rely here on the evidence of Ms Whitby, who outlines her concerns around the proposed planting on Sangsters Road not being implemented until the later stages of construction (paragraph 77).

18. KiwiRail's SIA explicitly relies upon a number of assumptions regarding primary or physical effects which inform the social impact assessment. In many cases, these assumptions appear to lack certainty. Some areas of uncertainty, for example, are whether:
- (a) Landscaping will largely take place (and will have matured) by the commencement of construction;
 - (b) Noise mitigation will be in place before construction and will be largely sufficient to address levels of noise generated by the Freight Hub; and
 - (c) Sequencing and staging of construction will occur in the order currently set out in the AEE (albeit there is no apparent certainty that this will be the case).
19. Based on my review of the proposal, including the conditions for the designation proposed by KiwiRail, some of KiwiRail's assumptions cannot comfortably be relied upon to inform the assessment of potential social impacts. As an illustration, I note that other reporting officers raise concerns about the feasibility of landscaping and noise mitigation being implemented prior to construction, and therefore I consider this would likely affect the ability for these features to provide mitigation of the potential severity of social impacts (e.g. by providing screening), particularly while construction is underway.
20. I acknowledge that the nature of a designation means that specific details around construction plans and staging do not need to be finalised at the time the NoR is lodged. However, this uncertainty can make it difficult to accurately assess the effects and highlights the need for robust management processes to accommodate flexibility while ensuring all effects (including social) are managed appropriately.
21. For these reasons, I am concerned that KiwiRail's conclusions as to the social impacts of the NoR may be unreliable (or unreasonably certain) at this stage. In my opinion, the consequence of the information gaps and resultant uncertainty is that the potential social effects for residents within the local area may be more adverse than as assessed in KiwiRail's SIA.
22. I acknowledge that I have not undertaken a separate SIA to evaluate these potential gaps and address these uncertainties. However, I consider the uncertainty (and potential social consequences of the uncertainty) are

sufficient to acknowledge this potential risk. I further discuss approaches to improve the management processes as a potential way of mitigating and managing uncertain impacts later in this evidence.

4.2 Scale of Assessment - Adequacy of local community impact assessment

23. The second key issue is whether Kiwirail's SIA accurately identifies all potential social impacts within the local community impact assessment. This includes, in particular, the lack of information provided on potential impacts for specific parts of the 'local community area', in particular the existing Bunnythorpe community at the northern end of the proposed designation area.
24. Kiwirail's SIA defines the 'local community' as the area within an approximate 1km radius from the designation extent, and has also assessed effects on the wider community. It is generally good practice within social impact assessments to consider impacts at varying scales, and I consider the areas identified in Kiwirail's SIA to be generally appropriate for this purpose. However, I consider that an SIA should also identify potential communities within the geographically defined areas, for example by looking at existing patterns of development and the characteristics of communities in the defined area or particular 'communities of interest' (particularly vulnerable communities). It is relevant to consider how the project may impact on these people or sub-communities within a local area.
25. I consider that by focusing on the 'local community' in its entirety, more significant impacts on specific parts of this local community may be obscured. In particular, I assume that impacts on the Bunnythorpe community specifically (at the northern end of the designation extent) will be potentially different to the effects on rural or industrial users within the defined local community. Bunnythorpe is an established local community with a different land use and social characteristics to the remaining local community area and potentially a different 'sense of place' and identity. Accordingly, in my opinion a more specific consideration of the effects on the Bunnythorpe community is warranted as part of the SIA. Such an assessment would include consideration of the history of the area, sense of identity, and what the boundaries / extent of this community are for those who identify themselves as part of that community. Absence of this specific information makes it more challenging to understanding how the Bunnythorpe township and its

community may be impacted, particularly in regard to community character and sense of place.

26. The methodological approach of a generic 'local area' also risks generalising potential impacts for those 'closer to the project' within the local area. For example, impacts may be more significant for the most immediate neighbours of the proposed Freight Hub site, but only an 'overall' impact rating for the local community area has been provided which risks obscuring the fact that impacts may be higher in some parts of the local community.

4.2.1 Changes to impact ratings in s92 response

27. In the s92 request compiled by Palmerston North City Council I indicated the concerns I have set out above, regarding the lack of more detailed assessment at the sub-community level (Q103). The s92 response³ stated that one local impact area had been applied based on geographic extent and noted that this approach was in part taken due to the level of detail available at the NOR stage.
28. The s92 response did provide some conclusions on more localised impacts, which I consider have been useful in understanding the nature of potential social impacts on Bunnythorpe itself. However, the 'proximity evaluation' provided in the s92 response, is not applied across the whole local community area. For example, the s92 response (Q103) notes "conclusions on visual amenity find that effects vary markedly between residences on the eastern side of Railway Road from low to moderate-high adverse" but does not denote which properties will experience the highest impacts, and from this does not consider how other social impacts (such as sense of place and community values in their environment) may differ at this localised scale. In the s92 response (Q107), it is noted that impacts on amenity and quality of environment will be moderate-negative across the local community as a whole, but the SIA does not specifically identify those parts of the local community that may be more adversely impacted than others – albeit it is acknowledged that they may be. It is my interpolation that this is due to limitations on the information that the SIA assessor had regarding the project. However, the lack of such assessment limits the ability to understand the nature of potential adverse social impacts beyond those 'generically' identified and

³ See page 3 of the s92 response (response to Q103).

makes it challenging to identify specific mitigation measures that may be appropriate for these affected or impacted areas.

29. Appendix 3 to the s92 response is a map identifying some specific effects on parts of the local community. I consider this assists in understanding some areas of more localised impacts within the local area. However, I consider that the assessed impact ratings are not provided comprehensively across the map, e.g. they are given for one area (properties north of designation extent), but not for any other areas. As another example, impacts on community are discussed for Bunnythorpe centre and within the designation extent, but not for any of the other 6 sub-communities included in this map. I consider this generalisation makes it difficult for the reader (and the potentially impacted community) to determine how impacts in one area of the local community may differ from those elsewhere. Similarly, it is assumed this assessment is based on the completed operational impacts of the development (rather than stages of development of while construction is underway).
30. Furthermore, as these more localised impacts assessed in the map are not carried over into the updated impact assessment table (in the s92 response) and the impact ratings in this table are still only given and described at the local impact scale this compounds the issue.
31. Therefore, I consider that while the s92 response does provide additional detail around impacts at more localised scales, this response does not completely resolve the limitation preventing accurate identification of how impacts may differ in specific areas of the community. As a result of the above, I remain of the view that there may be some residents for whom the adverse social impacts may be more severe than the identified impact for the overall local area.

4.3 Positive effects

32. The main positive impacts of the project as identified by KiwiRail (in the SIA) are improvements to safety in the local and wider impact area, and the provision of employment opportunities in the area.
33. I agree with the identified potential positive impacts of the project, and agree with the SIA assessment that these will both have low positive impacts in both the local and wider impact area.

4.4 Adverse effects

34. The majority of impacts identified in the SIA are identified as being either negligible, low or moderate negative. The SIA identifies the main negative impacts of the proposal as being:
- a. During construction: impacts on way of life and amenity (resulting from noise, visual and vibration impacts).
 - b. During operation: impacts on amenity (relating to noise and visual impacts), community connectivity, and community character.
35. While I agree that these are likely to be the most significant social impacts arising from the construction and operation of the Freight Hub, I consider that the scale of potential impacts will likely differ in different parts of the 'local community area; such as for those streets in immediate proximity to the designation extent and for the 'Bunnythorpe community'. In my opinion, and acknowledging the uncertainty as to the timing, scale and duration of works proposed by the KiwiRail for the designated works (discussed in Section 4.1) I consider that these social impacts could be more adverse than is anticipated by the SIA, and in some cases may be high adverse in some areas / for some parts of the community. I consider this matter further in light of the submission received in respect of the designation.

4.4.1 Community character

36. At present the industrial area to the south of Bunnythorpe is some distance from Bunnythorpe village. In other words, there is effectively a land use buffer between the industrial fringe of Palmerston North and the community of Bunnythorpe. This separation contributes to the rural feel of the village and surrounds and its geographic extent separate from Palmerston North. The northern end of the proposed Freight Hub will, however, encroach directly into the existing community area (in some cases such as Maple Street, along streets of largely residential character). As such, I consider there will no longer be the separation between industrial and rural/residential land or between the industrial fringe of Palmerston North and the Bunnythorpe 'village' and community.
37. In the s92 response (Q111) it is noted that "there is no indication the Freight Hub will alter the sense of community". However, (and again while acknowledging that I have not undertaken a separate social impact

assessment), based on my experience in land use planning I would expect this pattern of development to change the residential feel of the area and potentially alter community character for Bunnythorpe.

38. Furthermore, as noted in the social impact assessment (section 3.1.4), Bunnythorpe residents currently value the quiet, rural feel of the community, historic features such as the Cemetery and war memorial, and aspire to retain the quiet village feel of Bunnythorpe as well as improving the safety of the village. I consider that it is these specific 'sense of place' values that could be impacted by the designation change, which effectively links the industrial fringe of Palmerston North to Bunnythorpe. I consider this potential impact warrants specific evaluation and this is not evident in the SIA.
39. While acknowledging the uncertainty of my assessment (based on the review of the SIA), I would expect this could have potentially moderate or even high adverse impacts on community character, dependent on the level of mitigation that is employed to reduce this impact and the timing of the mitigation in respect of construction and potential staged operation activities.
40. For the above reasons, while the SIA assesses potential impacts on amenity to be high negative in the local area (an assessment I agree with), I consider that negative impacts on community values and aspirations (community character) will also be experienced, and these potential impacts could also be potentially moderate to high adverse effects.

4.4.2 Way of life

41. The SIA has concluded that impacts on way of life will be low-moderate negative in the local impact area during construction, and moderate-high negative during the operational phase.
42. I have previously discussed the assumptions that I believe the SIA rely upon.. In particular, the assumption that the landscaping and noise mitigation will be largely sufficient to shield residents from the majority of noise and visual impacts by the time construction begins. On the basis of evidence from Mr Lloyd and Ms Whitby, I do not consider that these are necessarily reliable assumptions for the SIA. In the absence of effective mitigation or minimisation/avoidance of these effects, , I anticipate that consequential potential adverse impacts on way of life could be moderate-high or even high during the construction phase (particularly if appropriate noise and visual is not in place

before construction commences, or if the proposed noise and visual mitigation prove to be insufficient to mitigate these impacts for specific properties or residences).

43. The noise generated by construction disrupts patterns at work and home (such as working from home, sleeping etc). This impact will be exacerbated by the long construction period (anticipated to be 6 years) in which residents will be subject to construction noise. The level of uncertainty currently surrounding construction staging could also exacerbate this impact (as noted in the s92 response), as residents may be unable to anticipate when to expect things like road closures, travel delays and increased noise levels.
44. I agree with the SIA assessment in its conclusions concerning the Freight Hub's operational phase, noting that the change in noise and community character arising from the Freight Hub will likely impact people's daily routines at home (sleep, working from home, spending time outside) and the road closures and relocations will likely affect travel patterns. I agree that the severity of impacts on way of life will be greatest if night-time activities occur at the Freight Hub.

4.4.3 Sense of place

45. In addition to the impacts discussed above relating to community character, I consider that the construction and operation of the Freight Hub will adversely affect local residents' sense of place, particularly for those currently living in or identifying themselves as part of the Bunnythorpe community.
46. I have discussed uncertainty (in terms of construction methodology, sequencing and provision of mitigation) earlier in this evidence and would assume that in addition to complicating the assessment of impacts, uncertainty about construction will have direct impacts on sense of place for residents of Bunnythorpe.
47. In my experience, a lack of certainty around projects such as this can lead to fear, stress and anxiety amongst communities due to an inability to clearly understand what sort of changes will be occurring in the community. The consequences of such uncertainty can mean that families with the resources to do so leave the area, and this itself can result in the community and its sense of place / identity being impacted. I also consider this potential loss of identity will likely increase in severity the longer uncertainty is not resolved (e.g. the

longer the duration of construction and staged development if this is not clearly communicated to the community).

4.4.4 Bunnythorpe Cemetery

48. I disagree with the SIA's conclusion concerning the potential impacts to users of Bunnythorpe Cemetery. The SIA concludes that there will be a 'negligible' impact on users of Bunnythorpe Cemetery because noise levels will be audible but not loud enough to affect amenity. While noise levels might be within 'acceptable' limits for a residential area, this does not necessarily mean that users of the cemetery will not experience a negative change in sense of place, from the current cemetery environment, particularly considering the sensitive nature of activity at the cemetery (being a place of contemplation and reflection). On this basis, I consider that the social effect on the environment is likely to be greater than negligible for users of the cemetery. Furthermore, I also note that the lack of a cultural values assessment means that more considered evaluation of values associated with the cemetery has not been undertaken. While I would need to conduct my own impact assessment to reach a more definitive conclusion about the scale of impact, in the absence of this I draw on my involvement in the East West Link project (Auckland), where impacts of a new transport corridor on the Waikaraka Cemetery, subject to specific bunding and planting mitigation were determined to be low-moderate negative.

5 Submissions

49. I have reviewed the public submissions on the proposal and have observed the following key themes from a social perspective:

5.1 Way of life, quality of environment and amenity

50. The most commonly raised concerns from a social perspective are those relating to noise and vibration. These concerns predominantly related to noise affecting people's wellbeing, stress levels and daily routines,⁴ particularly at night (way of life impacts). Specific examples were given of activities that would be disrupted by the construction and operation of the Freight Hub. These included sleep, working from home and dining outside. It was also noted in submissions that the construction period is lengthy and will expose

⁴ Submitters S10, S15, S28, S33, S72, S53, S68, S91, S40, S61, S36, S86.

residents to construction noise for a significant length of time.⁵ Furthermore, some submitters noted that they or their family members currently experience hearing or sensory issues that would be exacerbated by the increased noise levels.⁶ One submitter noted that there was significant fear and uncertainty in the community about the scale of change to be expected.⁷

51. Similarly, some submitters were concerned that the Freight Hub would lead to an increase in traffic, which would make the Bunnythorpe environment more unpleasant due to congestion and additional road noise.⁸

5.2 Community character

52. A number of submitters mentioned impacts on the character and values of Bunnythorpe, noting that they had moved to Bunnythorpe to seek out peace and quiet and a rural environment, and that the community would not retain this character once the Freight Hub was operational.⁹ Submitters noted that the Freight Hub would “dominate and redefine the landscape”¹⁰ and would alter Bunnythorpe “from quiet rural area to 24/7 industrial area”.¹¹ I consider these submissions encapsulate the Freight Hub’s potential impacts on the character and sense of place of Bunnythorpe (discussed above at 4.4.3).

5.3 Bunnythorpe Cemetery

53. One submitter raised concerns about the proximity of both the construction and operation of the Freight Hub to the Bunnythorpe Cemetery.¹² This submission notes that it would be “very disrespectful” to have the Freight Hub operating so close to the place where people’s ancestors are laid to rest. I have considered this matter acknowledging the absence of a cultural values assessment and the lack of a historical context assessment in respect of Bunnythorpe in the SIA (discussed above at 4.4.4).

⁵ Submitter S25.

⁶ For example, submitter S6 and S50.

⁷ Submitter S59.

⁸ S28, S41, S70, S64, S6, S27.

⁹ S72, S59, S84, S15, S35, S79, S34, S53, S72, S53, S1, S40, S4, S70.

¹⁰ Submitter S59.

¹¹ Submitter S72.

¹² Submitter S64.

5.4 Lack of consultation

54. A lack of consultation with both iwi¹³ and the community¹⁴ was identified in submissions. This has resulted in concerns that design of the Freight Hub has not had sufficient input from the community, including mana whenua, and has not addressed cultural values appropriately. Submitters have also proposed additional mitigation that would help to respond to the concerns of the community, such as restricting operating hours,¹⁵ extending noise walls along the whole rail corridor¹⁶ and offering sound proofing for homes.¹⁷ I agree that there are opportunities for further mitigation responses to address potential social impacts and residents' concerns and I propose a number of mitigation measures in this regard (discussed in section 6 below).

6 Mitigation and management

55. I generally agree that the mitigation proposed in the SIA (such as the establishment of a Community Liaison Group and a liaison person at KiwiRail) will contribute towards addressing potential social impacts and the community concerns that may arise during both construction and operation of the Freight Hub.
56. I support the creation of a complaints register as covered in Conditions 22-25 of KiwiRail's proposed conditions. However, I note that Condition 22 as currently written would only require the complaints register to be maintained until 12 months after the commencement of operation, and would therefore not necessarily cover the full build out of the site (which may be undertaken in a number of stages). I recommend that the complaints register be an ongoing requirement of site management to ensure that the community can voice any concerns about the Freight Hub's operations at any time.
57. As an overarching observation, I am unsure whether the mitigation as proposed by Kiwirail will be as effective as anticipated. For example, with regard to addressing the impacts of noise on people's daily patterns, the SIA recommends providing "clarity for the community about the night-time activities that will be undertaken" and ensuring "night-time noise effects are appropriately mitigated". In the absence of more detail around what

¹³ Submitter S14, S49, S66, S69.

¹⁴ Submitter S6, S72.

¹⁵ Submitter S86

¹⁶ Submitter S44

¹⁷ Submitter S72.

“appropriate” mitigation of night-time noise effects may look like, conclusions cannot be drawn about its effectiveness. Even if clarity was provided enabling the community to manage their expectations regarding disruption and impacts, this would not reduce or ameliorate the amenity and quality of environment impacts themselves.

58. I am also aware that other experts, Ms Whitby (landscape) and Mr Lloyd (noise), have their own recommendations in respect of landscape and noise matters. If a consequence of those recommendations is that additional mitigation measures are required, it should be noted that such measures have the potential to influence/ change the profile of social impacts on community character. For example, if a higher noise wall is required to address noise effects (and therefore address quality of life effects relating to aural amenity), this in turn could more clearly delineate the encroachment of the Freight Hub into Bunnythorpe (e.g. a greater physical severance and impact on sense of place). Given the uncertainty on the detail of these measures there remains uncertainty over the nature and scale of potential social impacts and I consider a structured management response is appropriate to address this (discussed further in section 6.1).
59. While the creation of a Community Liaison Group (“**CLG**”) is a positive step towards mitigating some potential social impacts, I consider that the existing conditions around the CLG could be strengthened to direct that aspects of design outcomes are to be developed and confirmed with the community (through meaningful engagement). In response to the uncertainty of potential impacts I have identified in this evidence, this would allow for more specific impacts on particular parts of Bunnythorpe to be considered and outcomes to address them to be considered with the community. Specifically, I recommend:
- (a) That a list is provided of organisations or sectors of the community that should be invited to partake in the CLG (including but not limited to youth representatives, a Bunnythorpe School staff member or student, representatives of the retired community in Bunnythorpe, individuals from each of the streets adjacent to the Hub, and mana whenua representatives).
 - (b) Extending the responsibilities of the CLG to include inputting into design outcomes of the Freight Hub and any urban or landscaping plans (not

currently provided for in the condition), particularly in respect of any staged development and the timing and nature of mitigation works proposed.

- (c) Specifying (through the existing CLG conditions) that the CLG shall be provided with an opportunity to review and give feedback on each 'stage' of construction and operation.
- (d) Modifying Condition 12 (which specifies that the CLG shall be maintained until at least 12 months after the Hub commences operation) to require the CLG to be maintained in perpetuity or until the community representatives (by majority) confirm that the site operation is in its final form and that the matters that the CLG has been concerned to have been considered and responded to by Kiwirail. To this end, I consider the condition should specify that once the Freight Hub commences operations, the CLG would meet annually, but may meet more or less frequently where the CLG determines this to be necessary / appropriate.
- (e) That after the CLG has provided input into, for example, landscaping plans, there are opportunities for the CLG to review whether the implementation of such plans is being done in accordance with outcomes identified in the Design Framework (discussed below), and addressing the effects that it was seeking to mitigate. In cases a review raises new issues it is proposed that a mechanism is provided for such matters to be raised, considered and responded to by the Requiring Authority.

60. The SIA also recommends and relies on commencing mitigation planting as soon as practical to mitigate adverse impacts on amenity. I agree and consider it is important to ensure that effective screening is in place by the time the construction commences, and I rely on recommendations of my colleagues Mr Lloyd and Ms Whitby in that respect.

61. Overall, I am concerned that the majority of Kiwirail's recommended mitigations to address the social effects consist of landscaping, noise and construction management measures, which themselves have a degree of uncertainty about their timing and effectiveness, and could still be subject to significant change through detailed design. Again, I consider the ongoing review and role of the CLG in commenting on the development and

implementation of these management plans is appropriate as a minimum to address this.

62. From my review, I understand that the Freight Hub's construction will likely occur over a long delivery time, and that there may be stages of operation between different periods of construction activities. While this may, in some regards, reduce the severity of potential impacts as experienced by the community (as they will have a longer time period in which to adapt to these changes), on balance I consider that the nature of the proposal warrants an ongoing management strategy to work with the community and progressively develop management plans etc to respond to 'outcomes' defined (discussed below) and that this is undertaken as the development of the Rail Hub progresses. I discuss the detail of this 'design framework' approach further below.

6.1 Design Framework

63. I consider that the creation of a design framework for the project would provide the opportunity for an integrated, iterative approach to addressing potential impacts identified by the various specialists (such as noise, landscape/visual and transport), as well as potential social impacts. Ideally, I consider that such a framework would be available in advance of confirming a designation, so that the community, stakeholders and Council can confirm the outcomes that they expect from the mitigation and development design. If such a framework cannot be developed in that timeframe, I consider that there remains scope for this to be delivered by requirements for conditions of the designation.
64. A key benefit of the framework is that it could provide an explicit opportunity for the uncertainty of the project and delivery of the mitigation to be addressed. This approach allows for specific mitigation works and design elements to be scoped and developed over time, as Kiwirail advances design or project stages. This also provides a mechanism through which Kiwirail can respond to the potential impacts of activities, while the community can have some certainty over the outcomes that will be delivered through such response. For this reason, I propose an approach that will establish guiding design principles and outcomes expected from the mitigation and require specific measures to be developed in response to construction phases, staged development of the site and/or emerging issues and opportunities that are

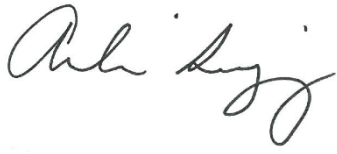
identified. Given the nature of the recommendation, I have worked with Ms Whitby in the preparation of the 'design framework approach'.

65. The expectation, which can be reinforced by conditions on the designation, is that principles and outcomes established in the design framework will be a guiding document used to inform the design, construction, and operation of the site at various stages, which will need to be demonstrated in the various management plans and outline plans for the designation.
66. At a minimum, Ms Whitby and I consider that design principles and outcomes for elaboration and inclusion within the design framework should address the principles expressed below:
- A whole of landscape approach to appropriately integrate the Freight Hub with its immediate and wider landscape setting.
 - Maximisation of beneficial outcomes for natural character, rural character and visual amenity, to complement a high quality landscape.
 - Maintenance and/or enhancement of amenity values in the wider landscape, including the sensory appreciation of the rural landscape (including but not limited to visual aspects).
 - Noise mitigation measures and the potential outcomes of such measures, to have particular regard to visual amenity, outlook and privacy, and landscape character.
 - Integrated lighting design, to have particular regard to visual amenity, landscape character and natural darkness of the night sky.
 - Building and structure design to reflect the rural character of the context.
 - Community identity and place, including opportunities to reflect the context of place and/or cultural and historical values of place.
 - Community connectivity through and around the site.
 - Pedestrian and cycle access around the site and to/from the Bunnythorpe community area.

67. This list will also need to reflect any key principles or desired outcomes that are identified through the preparation of a Cultural Values Assessment, as discussed below.
68. I recommend that one of the functions of the CLG will be to sit within or as part of the design framework development and implementation process (as introduced above). This approach would enable the community (through the CLG) to have representation and an opportunity to review and input into the outcomes that the mitigation design at each stage of the design process is seeking to deliver.
69. In combination, the design framework development and associated engagement process would provide a mechanism to address both the Freight Hub's uncertainty (about timing and operation of the project) and potentially severe adverse social effects.
70. I consider that similar design frameworks have been developed for other infrastructure projects around the country and I consider that these have been successful in creating an integrated approach to managing effects and reflecting community outcomes.
71. I consider that a Cultural Values Assessment ("**CVA**") should be required and (again) ideally this would have informed the overall assessment including the social impact evaluation. If a CVA is not prepared prior to a recommendation being made on the NOR, a condition could be added requiring a CVA to be prepared. Such a condition would need to be supported by iwi submitters because any CVA would need to be either undertaken or endorsed by mana whenua (KiwiRail cannot independently evaluate the effects on cultural values when they do not hold the knowledge of what those values are).
72. If a CVA is prepared, as a minimum it should be required as a condition that the recommendations of the CVA are reflected in the management plans developed during detailed design of the Hub and that iwi (including those in the community) are given opportunity to comment on how the Design Framework responds to matters of the CVA. Where comment is made, I consider it appropriate that the Requiring Authority document how they have responded to that feedback (or in instances where they have not made changes to respond to those matters, explanation on why they have not).

7 Conclusion

73. In summary, I agree with the SIA's findings that the majority of social impacts for the local and existing community arising from the construction and operation of the Freight Hub are likely to be adverse, and that impacts on community amenity, character and quality of environment are likely to be the most significant impacts.
74. There is a significant amount of uncertainty surrounding the timing and implementation of the project, therefore in my opinion the social impacts are difficult to determine at present. For the reasons set out in this evidence, I consider these are likely to be of higher severity than assessed in the SIA, particularly for some residents and communities within the identified 'local area'. I note that the submissions process has highlighted community concerns about quality of environment, amenity and community character being significantly impacted by the proposal.
75. In light of the above, I consider there is a risk that in understating the likely potential adverse social impacts, appropriate mitigation measures have not identified.
76. While the mitigation proposed by Kiwirail goes some way towards addressing social impacts, I consider that additional mitigation is appropriate to respond to the potential impacts identified. I have sought to identify appropriate conditions to establish mechanisms to address the uncertainty around aspects of the proposed construction, the long lead-in time before the Freight Hub becomes operational, and the nature of community change that will occur in the Bunnythorpe community over this time period.
77. I support the proposal for a design framework to guide the development of mitigation measures for the construction and operation of the Freight Hub. I consider this will provide for an integrated and iterative approach to potential adverse effects and, through the CLG, will enable ongoing community engagement and feedback in the development and implementation of the Freight Hub that will respond to potential adverse social impacts.
78. Finally, I recommend strengthening the conditions regarding the CLG to provide more information on its makeup and responsibilities, and also support the additional mitigation recommended by other specialists.

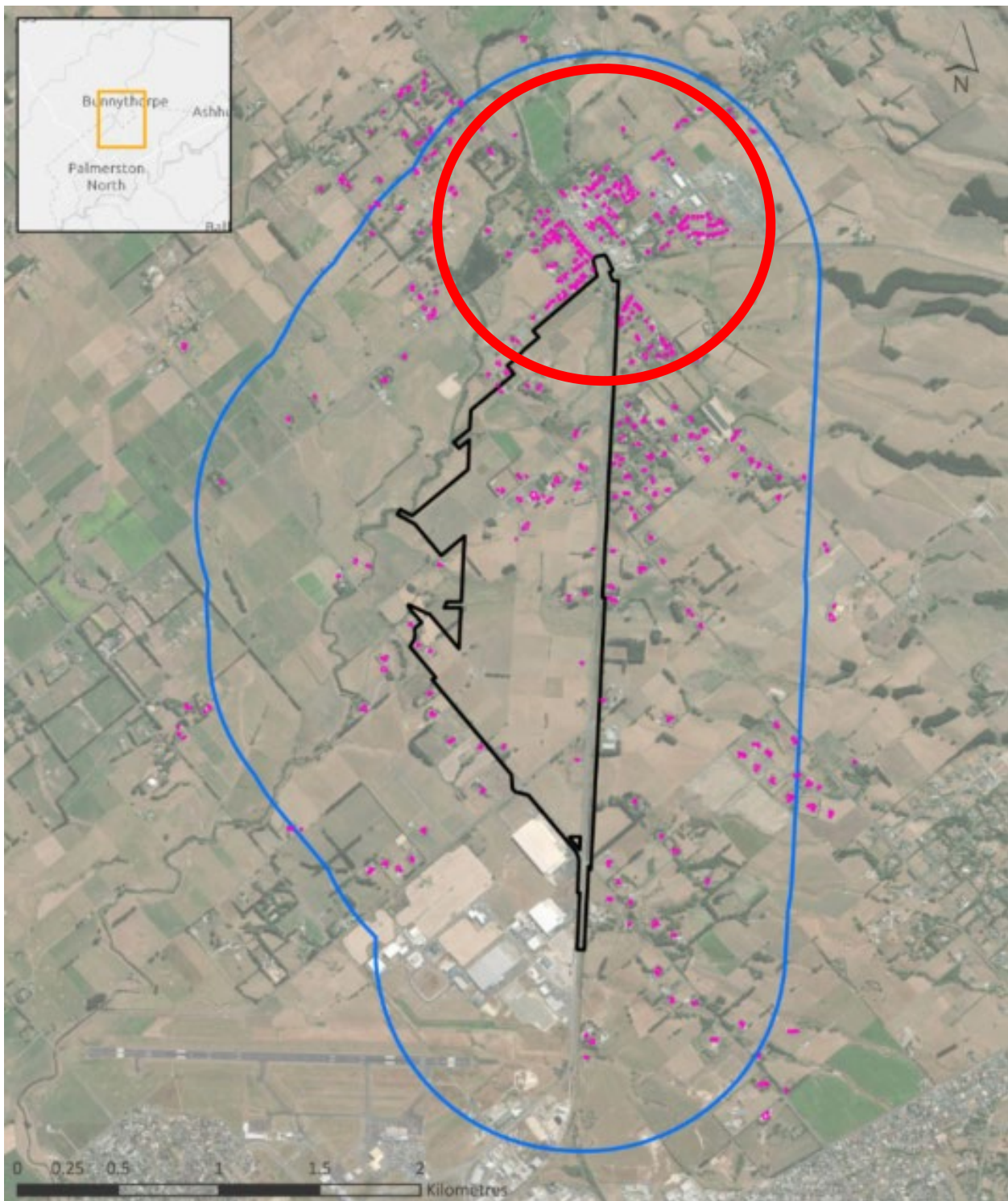
A handwritten signature in black ink, appearing to read 'Amelia Linzey', written in a cursive style.

Amelia Linzey

18 June 2021

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Appendix A – Map of ‘local community’ area and key area of SIA review focus



Map of the designation extent (outlined in black) with Ms Austin's 'local impact area' shown in blue. The area I am principally concerned with, and which has formed the main focus on my review, is shown by the red circle.