

29 November 2016

Michael Richardson
Town (Precinct) Manager
The Karangahape Road Business Association (KBA)

Dear Michael,

Auckland Transport Consent Decision (November 2016): to construct the Aotea Station to North Auckland Line (NAL) section of the City Rail Link (CRL) and provide for the ongoing operation, use and maintenance of the entire CRL route (Britomart to NAL).

As requested, I have set out the key points arising from the resource consent decision as they relate to KBA, and outlined a few matters that KBA will need to consider as next steps associated with the CRL project and future consenting processes.

Background

On October 18, 2016 the Karangahape Road Business Association (KBA) presented a joint submission with Heart of the City to a resource consent hearing for the next stage of the City Rail Link (CRL), associated with works around the planned Aotea, K'Rd. and Mt. Eden rail stations.

The submission provided evidence of significant negative impacts being experienced by businesses in the lower Albert St. and downtown area due to CRL construction works to date (e.g. reduced trade, pedestrian hazards, construction noise affecting customers and shopkeepers). We sought that the consent decision should require Auckland Transport to:

- Take steps to mitigate the potential business disruption impacts in the next stages of construction of the CRL
- Establish a dedicated Business Liaison Group to complement the existing Community Liaison Groups (CLG), to focus on mitigation of business disruption impacts
- Allocate funding to spend (as agreed) on mitigation measures.

Auckland Transport has recognized that CRL construction mitigation measures are necessary, but to date the measures have been limited to 'transport fixes' in the Albert Street and Britomart areas, including partial road closures, relocating parking, taxi stands and loading zones, and relocating bus lanes and bus stops.

Auckland Transport has been reluctant to take responsibility for adverse effects on business operations, and argued that this particular resource consent was limited to very specific matters (e.g. noise, air discharges, earthworks and stormwater diversion) and that the issues that we raised are not within the legal scope of the consent.

Consent outcome

The Commissioners' decision acknowledges the limitations on scope but nevertheless has given direction to Auckland Transport to make changes to its practice. The definition and mandate of the CLGs has been changed to explicitly include businesses, and the K'Rd. one will now be called the K'Rd. Community and Business Liaison Group (CBLG).

A new consent condition has also been added that does not currently apply to the CLG in the Albert St./downtown area. The new consent condition requires Auckland Transport to, *'respond to any issues raised [in the CBLG] in regard to business disruption'*.

The Commissioners stated:

"We have amended the definition of the CLG specifically to include businesses and point out the effectiveness of these plans and groups does depend on the participation of the parties affected by the project. The Heart of the City and the Karangahape Road Business Association representatives need to participate through the processes that are set up to assist them and in this respect we recommend initial contact with Ms Greensmith as the Communications Manager for AT.

"We would be concerned, as would the Council, if it was to be found these processes were not effective for businesses in the City. If problems did arise then the review conditions provide some assistance but as we say the Council would seek to become involved if there was evidence of a substantive nature supporting concerns for undue business disruption."

In effect, this puts Auckland Council and Auckland Transport on notice that problems for businesses must not be ignored or dismissed, and that better steps should be taken in advance to minimise or mitigate such impacts. However, it also places responsibility with the business associations to partner with both organisations effectively and to produce substantive evidence of business disruption impacts should they occur.

To take advantage of these changes to the resource consent, KBA will have to be proactive in setting a broader agenda and committing to engage with Auckland Transport via the CBLG.

The timeline for the K'Rd. CBLG is as follows:

1. Immediately – Auckland Transport has to prepare a ‘Pre-Construction Communication and Consultation Plan’ **in consultation** with CBLG among others.
2. By 20 January 2017 – Auckland Transport submit to Team Leader Central Monitoring a Pre-Construction Communication and Consultation Plan
3. By 17 February 2017 – Auckland Transport establish a Community and Business Liaison Group **in consultation** with Council’s Team Leader Central Monitoring
4. The CBLG must meet at least annually until construction starts, at least every three months when construction is underway and for six months following completion and another six months if the majority of members agree.
5. At least three months prior to construction Auckland Transport must prepare a Communication and Consultation Plan.

The Pre-Construction Communication and Consultation Plan’ and final ‘Communication and Consultation Plan’ will be key instruments for KBA to influence to ensure they provide a platform for voicing businesses concerns and guiding appropriate responses from Auckland Transport.

Making the most of the K’Rd. CBLG

In order to sustain the K’Rd. precinct’s role as an iconic retail and entertainment destination it will be critical to avoid perceptions that it is ‘closed for business’ during construction of the CRL. Businesses will be understandably concerned about disruption to staff getting to and from work, and to retail trading due to reduced visitor numbers or pedestrian movement in locations where construction works are happening for prolonged periods.

I note that the decision does not require Auckland Transport to dedicate a specific sum of money to be used for mitigation measures. As well as yourself joining the K’Rd. CBLG, other members of KBA should be encouraged to participate so as to add weight to the business voice, and be in a strong position to raise issues as they occur and advocate for funding of mitigation measures in advance. It will also be important for KBA to mobilise members outside of the CBLG meetings to provide evidence of business disruption impacts and to collect ideas for positive actions to take to ‘offset’ any such impacts.

Should KBA have concerns with the effectiveness of the CBLG it could seek support from the City Centre Place Activation team (in the Auckland Design Office) which has a role to play in city centre place management and activation. Tangible actions will need to be taken to encourage and restore visitation to the precinct during and after episodes of construction driven disruption. For instance, shop sales and public events could be staged in conjunction with re-openings of streets upon completion of reinstatement works.

Finally, KBA will need to consider its resource needs over the next 1-3 years so that it can effectively engage in subsequent resource consent stages of the CRL such as the designation change to the K’Rd station that Auckland Transport has signalled will commence early in 2017.

I trust the above gives you an overview of the outcome of the CRL consent process and next steps to prepare for. Please call me with any queries

Yours sincerely,

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

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