

Shared Path – EHEA Oral submission

I am Felicity Rashbrooke and I am here to speak to the East Harbour Environmental Association's written submission. I would like to make some general comments followed by some specific ones.

The East Harbour Environmental Assn – known as EHEA – has been caring for the East Harbour environment since early 1975, and has **been advocating, on environmental grounds, for a walkway for most of this time**. Our environmental grounds are based on the belief that walking and cycling are better for the environment than private car use, and that everyone should be able to walk or cycle to schools, doctor, library, shops etc.

EHEA was represented, from its inception, on a Walkway steering group set up by HCC in the early 2000s, and so has considerable background knowledge in this matter. However more recently we have been dropped from the consultation process which we consider very unfortunate.

Public transport advocacy. EHEA has also long been an advocate of public transport as a way of reducing air pollution, traffic congestion etc. An example of this advocacy was EHEA's involvement in working alongside the bus company in getting the bus lane on the Petone Esplanade adopted.

Climate change and air pollution. The need to reduce atmospheric pollution from transport sources has now become much more pressing due to what we now know about climate change. And we acknowledge that councils must take action to reduce climate change – in this case through reducing emissions from vehicles. However encouraging public transport use – in our case buses – is much better way to effect such a reduction than encouraging cyclists as only a very small percentage of the population can cycle long distances. We note in this context that Greater Wellington is committed to having an all electric bus fleet within the next few years.

Shared Path not cycleway. EHEA also wants to emphasise that this resource application is for a SHARED PATH. And not for a cycleway as a number of submitters seem to assume. Cyclists will need to slow down for walkers, dog walkers, runners, children cycling to schools etc. And in fact commuter cyclists will likely want to stick to the road as this will enable them to travel rapidly.

Double Curve. This was adopted by Hutt City Council (HCC) for two main reasons: the first, as is evident from this application, being its efficacy in deflecting wave action. But the second was to increase the safety of the pathway users where the road was more than 1 metre above the beach/rock level by ensuring any potential fall being less than a metre. This also had the effect of avoiding the need for handrails. In the Design Guidelines adopted by HCC any visual intrusion on the seaward side of Marine Drive was to be avoided.

Access to the coast. When the Resource Management Act, and the regional plans made under it, speak of access to the coast as being a priority ([see section 6 Matters of National Importance section 6 \(d\) and also section 6 \(a\)](#)) EHEA believes that this means being able to be in and enjoy the coast, as in being able to access our regional parks. HCC however seems to be interpreting this in a restricted sense to mean an

access point, as in steps or a ramp down to the beach/coast. EHEA contends that the construction of this shared path as set out in this application would seriously compromise access to the beaches in Mahina, York, Lowry, and Sorrento/Pt Howard areas thus contravening these sections of the RMA – these matters of national importance.

Increase in population and increased need for beach access. EHEA notes that the population under HCC jurisdiction is increasing and that there is increased use of beaches in the East Harbour area which means that there should be no reduction in beach areas in the bays due to the shared path. Recently a party of small children was using the York Bay beach which was a new development, and counters the argument put forward by some that these beaches are rarely used.

Width of path and parking. Nothing in this application appears to seriously address the potential problem of vehicles parking within the shared path if it is 3.5m wide. This problem is already being experienced in York Bay where the most recently constructed path is 3.5m. We vouch that the last thing HCC wants is to be always policing car parking on the shared path.

Scouring of beaches due to seawall. In York Bay it can be observed that the seawall has seriously scoured out the beach, and led to a significant loss of beach materials leaving the beach much lower than previously, and increasing the drop from the pathway to the beach, which will mean a more intrusive, bigger seawall will be built. This is extremely unfortunate as this southern end is the area most used for bathing purposes as it is sandier than elsewhere in the Bay. Many people use this area of beach, and it has been a longstanding habit to use the seawall as something warm to rest up against. To say, as this application does, that the proposed wall will not negatively impact on those who use this area of beach is totally wrong. It will also have a negative visual impact and impede getting down onto the beach.

With further construction of seawall the effects of scouring may well be even more damaging – and beach replenishment is not likely to either work well or be permanent.

Specific comments

Loss of beach EHEA disputes the need for the significant beach loss in the bays – for estimates of beach loss see GWRC s42 report Table 4 *Occupation of the CMA*. **We believe that with landward realignment of Marine Drive (particularly in York Bay, but possibly also in Mahina Bay) plus a reduction in shared path width that it should be possible to avoid any beach loss.** This would also allow for the retention of the “Atkinson” pohutukawa. It should be noted here that growing a tree in CMA is not easy, and that it took considerable effect to get this tree to grow.

Where the shared path is to pass alongside beach areas there is much less risk in narrowing the path width as beach composition does not present the same danger as rocks do. In general the drop between the path level and the beach is significantly lower than where it passes over rocky areas. And in the case of the South end of Lowry Bay the beach and road are at the same height.

In York Bay for example a **single curved wall in the beach area is all that should be needed**, especially if the whole carriageway and shared path are moved landward. This would mean that less or no beach would be lost.

As regards the landward realignment of the road we acknowledge that this would cost more initially but in the long run this could save money as with sea level rising due to climate change the moving the roadway landward would provide longer term protection for the road. We note that GWRC s 42 Officers report s 12.1.4 notes that landward realignment of Marine Drive in York and Sorrento bays is being considered, but Table 4 Occupation of the CMA ... still shows that considerable beach loss in the bays.

S12.2.4 of the same report notes loss of high tide beach and the need for beach nourishment. However path width reduction is ruled out, but no real evidence is given for this, except a reference to "crowding and busyness of the path" at Point Howard, Lowry and York Bays. But in fact at p.14 of HCC's s.42 report it is noted that Mr Wanty's brief of evidence recommends "clear path width of nominally 2.4 metres".

EHEA is concerned about the meaning of "busyness". In York Bay this could possibly refer to the speed limit of 70 kph. This latter could be remedied by lowering the limit to 50 kph.

Reduction in shared path width could be somewhere in range 2.5 – 3.00 metres where the path runs alongside beach areas in various bays.

Beach nourishment is at best a short term solution, and would commit the councils to replenishing the sand on a regular basis, thereby increasing long term costs.

Public transport

The expert evidence from Jamie Povall on transport matters notes the following: *"60. Bus stops: The Project will require the relocation of a number of bus stops in order to facilitate the new Shared Path. The relocation of the bus stops has been identified on the preliminary drawings but will be confirmed during detailed design and in liaison with the bay communities and bus operators and Greater Wellington Regional Council ("GWRC"). These relocations are required to better integrate the Shared Path and the bus stop, with the preferred option of taking the bus stop behind the bus shelter to reduce conflicts with bus passengers."*

However no consideration appears to have been given to bus users and hence to encouragement of bus use. Bus patrons include the young and the old, and they need bus stops to be located where it is safe for them when boarding and alighting. In the case of children alighting on the seaward side bus stops in Mahina and York Bays need to be sited where it safe for groups of children to wait and to cross a very busy road where traffic can legally travel at 70 kph.

Also by having the shared path passing behind the bus stop, bus users will be moved further towards the actual carriageway, as currently there is a de facto footpath passing between them and the traffic. This will further endanger bus patrons.

Slimline bus shelters, as appear to be advocated, are also absolutely unacceptable as people waiting in bus shelters would not be able to get far enough away from traffic to be safe, and when raining from being splashed by passing vehicles. This coastal situation is not your typical suburban one where there is formed footpath and a 50 kph speed limit.

EHEA also finds it unacceptable that a resource application which does not contain detailed specifications can be granted consent. In the case of York and Mahina Bays it isn't acceptable for bus patrons to be treated in such a cavalier manner.

In fact it is impossible to work out from these plans where exactly the bus stops in Mahina and York Bays are to be positioned but as far as we can ascertain the projected locations are not convenient or safe for bus takers, and therefore will deter people from using buses, and likely increase private vehicle use and its associated pollution.

However the assist the landward realignment of Marine Drive the bus stop in York Bay could be moved further landwards. It does not currently function well as a bus stop, and could well be better sited and designed so that those waiting could see approaching buses.

EHEA and bus users along with the Community Board and residents' associations would, at a minimum, need to be consulted in the siting and provision of bus stops/shelters. But granting consent without details gives bus users no leverage.

Safety barriers GWRC Officers report notes at 4.2.6 the need for safety barriers. However as noted earlier EHEA believes that the double curve (and triple curve) obviates the necessity for barriers as the fall is never greater than 1 metre.

We wish this application to be DECLINED because of the matters we have raised above – that is loss of beach, and inadequate specification of bus stop location and design.

Thank you for the opportunity to make this oral submission.