

**BEFORE A BOARD OF INQUIRY
EAST WEST LINK PROPOSAL**

IN THE MATTER of the Resource Management Act 1991 (**RMA**)

AND

IN THE MATTER of a Board of Inquiry appointed under s149J RMA to consider notices of requirement and resource consent applications made by the New Zealand Transport Agency (**NZTA**) in relation to the East West Link roading proposal in Auckland.

**SUMMARY OF EVIDENCE OF IAN CARLISLE FOR MERCURY NZ LIMITED
TRAFFIC
DATED 30 AUGUST 2017**

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SOLICITOR ACTING:

PARTNER RESPONSIBLE: RACHEL DEVINE

Overview of key conclusions of my evidence

1. In my evidence I have considered the adverse effects of the East West Link proposal on any temporary and permanent access to Mercury NZ Limited's (**Mercury's**) Southdown site (**Southdown Site**).
2. The potential adverse effects of the proposed East West Link designation and new road alignment on the existing access to, from and within Mercury NZ Limited's (**Mercury's**) Southdown site (**Southdown Site**) were not fully considered or detailed within the East West Link proposal application.
3. Traffic associated with the Southdown Site includes deliveries of goods and plant using heavy vehicles. Examples of larger loads that require access include the movement of generators, transformers and turbines.
4. For the reasons set out in my evidence I consider that if the East West Link proposal is confirmed, then appropriate conditions are necessary to ensure that appropriate access is provided both during and following construction for all expected activities.

Corrections and Clarifications

5. Since preparing my evidence I have identified two corrections and one clarification that I wish to make to my statement of evidence:
6. I understand that the substation assets that service KiwiRail are owned by Transpower and, therefore, where I refer to "*Kiwirail's substation yard*" at paragraph 13 and 14, the apostrophe should be omitted.
7. At paragraph 29 (b) of my evidence, the reference to the 4.0 m clearance from power lines relates only to mobile plant operating in the vicinity of the lines. The scope of the referenced Electrical Code of Practice (NZECP 34) does not extend to over-dimension loads on public roads. Therefore, the asset owner of the lines is best placed to provide guidance on the appropriate clearance that is required over a road. I have commented further on this aspect below.
8. At paragraph 45, reference CT 2 (g) should read CT 2 (i).

Matters that have changed since I prepared my statement of evidence

9. I attended the traffic expert witness conferencing on 7 June 2017 pertaining specifically to the Mercury's Southdown Site. The extent to which each of the matters discussed at that conference have been subsequently addressed is summarised below:

Item 2 Access to Site

- (a) The retention of the three existing property entrances to the Southdown Site has been confirmed by Mr Nancekivell at paragraph 7.24 of his rebuttal evidence and shown on updated drawing set 3, Road Alignment Plan, Sheet 7).
- (b) The extent of work indicated on Sheet 7 has been updated to show that no work at entrances will need to be undertaken within the Southdown Site, effectively retaining existing turning provision at the site boundaries.
- (c) Mr Nancekivell, at paragraph 7.25 of his rebuttal, advises that the gradient of the access to the southern parcel will be "approximately" 4% to 5%. I accept his stated maximum gradient should be adequate for the expected entrance use subject to the inclusion of suitable transitions at each end of the grade to provide for the necessary ground clearance for all vehicles (in particular the large transporters used for the heavy plant associated with Southdown Power Station). ***Conditions with respect to the project design would be useful to ensure that appropriate access standards were met (for all three accesses).***

Item 3 Internal Site Circulation

- (d) The proposed route¹ for internal circulation of vehicles shows traffic would be required to travel beneath the proposed East West Link structure and, in one location, a column head. An approximate 6 m clearance² is shown to the underside of the deck beams with the clearance at the column head significantly less which would not cater for the over-dimension vehicle as described in my evidence. Revised drawings provided by the NZ Transport Agency to date³ are yet to satisfactorily resolve this issue. ***A condition which refers to a minimum ground clearance of 5.7 metres⁴ would be an appropriate mechanism for provision of certainty.***
- (e) As the internal circulation routes provide access to on-site plant the route adopted is dependent on any revised plant layout. ***Therefore, I also consider it would be appropriate to impose conditions that enable the site circulation to be developed in conjunction with any layout changes and with consideration to access during the construction period.***

Item 4 Transpower Height Clearances

- (f) The evidence of Mr Roy Noble on behalf of Transpower at Appendix C indicates a new monopole (19B) will likely be required, in relation to the transmission line crossing Hugo Johnston Drive near to the Southdown Power Station entrance, to “*enable required clearances over Hugo*

¹ Mr Nancekivell, at paragraph 7.25 of his rebuttal, refers to a plan at Attachment F showing the tracking of large vehicles (plan PI-008-201 rev 0).

² Mr Nancekivell at paragraph 7.27 of his rebuttal plan Z5A-SK-80-202 Rev A

³ Including the revised drawing included with Lesley Hopkins' proposed Southdown Site-specific conditions provided to me

⁴ 5.7 m is based on the loaded vehicle height of 5.1 m as noted at paragraph 28 of my statement of evidence plus a clearance of 0.6m which is the clearance requested by Mercury NZ Ltd.

Johnston Drive extension” and “to satisfy the clearances in NZECP34”. However, this code does not apply to over-dimension loads, such as those which would need to access the Southdown Site. The movement of over-dimension loads on roads is governed by the Land Transport Rule: Vehicle Dimensions and Mass 2016. One of the requirements of this rule is to obtain the written permission from the owner of overhead wires or cables that the vehicle travels under, where the loaded vehicle height exceeds 5 m. Should the proposed transmission line height result in lower ground clearance than for the current road, then there is the possibility of affecting the transportation of over-dimension loads such as those associated with the Southdown Power Station. This matter is able to be addressed by a suitable condition such as ***requiring the ground clearances at Hugo Johnston Drive to be no less than those currently provided.***

Item 5 Pedestrian Access

- (g) At paragraph 7.28 of Mr Nancekivell’s rebuttal, he confirms that pedestrian access will be maintained to the Southdown Site. However, the updated drawing package (AEE-AL-107 Rev2) does not show a pedestrian facility between Hugo Johnston Drive and the southern parcel. While I accept that pedestrian access is possible between the northern and southern parcels, I consider each parcel should have its own pedestrian access to account for any potential changes of operation and without the need to rely on an adjacent land parcel for access. **If the East West Link was approved the conditions should require such pedestrian access to be provided.**

Item 6 Management of Construction Traffic Effects – Site Access

- (h) The experts agreed that, as per Item 2.2 of the Traffic and Transport Conference Statement, there should be a refinement of the conditions to ensure appropriate property access during construction will be maintained at all times.

- (i) I acknowledge that Condition CT 4(f) has been amended with the intent of meeting this objective. However, I note the wording of this condition targets accommodating *“the types of vehicles normally accessing the site during normal working hours”* which could be interpreted to exclude the over-dimension (or over-weight) vehicles necessary for the operation of the power station.

Conclusion

- 10. As explained above I do not consider that either the project drawings or proposed amended conditions provided by the NZTA subsequent to that conferencing, address all the matters raised with respect to the provision of access to, from and within the Southdown Site.
- 11. On this basis, I confirm my recommendation that to provide the necessary certainty to matters I have raised, additional conditions should be imposed should the East West Link project be confirmed. In this respect I understand Mr Nick Grala will present a revised set of proposed conditions that address these matters.

Ian Carlisle

30 August 2017