

BOARD OF INQUIRY

EAST WEST LINK PROPOSAL

IN THE MATTER

of the Resource Management Act 1991

AND

IN THE MATTER OF

of a Board of Inquiry appointed under s149J of the Resource Management Act 1991, to consider notices of requirement and applications for resource consent made by the New Zealand Transport Agency in relation to the East West Link roading proposal in Auckland

**OPENING SUBMISSIONS
ON BEHALF OF
JACKSON ELECTRICAL INDUSTRIES LTD**

4 July 2017

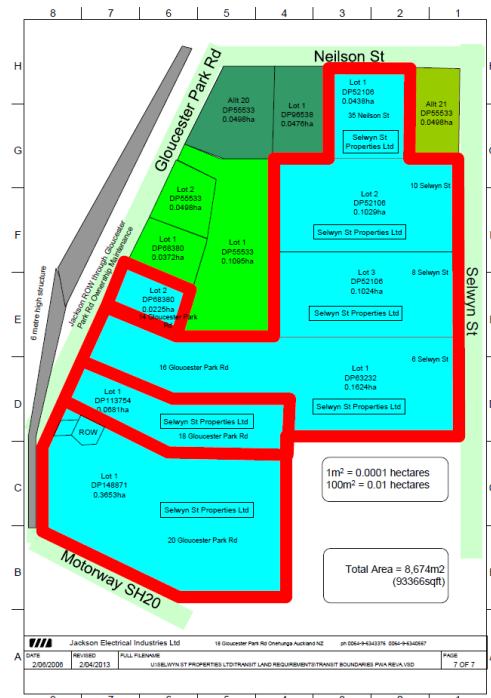
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MAY IT PLEASE THE BOARD:

1. These Opening Submissions are made on behalf of Jackson Electrical Industries Ltd ("Jackson Industries").

Background

2. Mr Jackson is the Managing Director of Jackson Industries, which is the occupier of the land at 18 Gloucester Park Road, Onehunga from which it has operated for the last 36 years.
3. Jackson Industries leases factory space from Selwyn St Properties, the owner of the site and buildings. Selwyn St Properties is owned by the Jim & Carolyne Jackson Trust.
4. The site comprises seven properties each on separate titles at this location and the main entrance is at 18 Gloucester Park Road Onehunga. The overall site area is some 8500m².





5. Since forming in 1977, Jackson Industries has grown to be a leading supplier of portable power distribution equipment used on small and very large construction projects throughout New Zealand and Australia. As a result of diversification Jackson today operates the largest Computer Numerical Control (CNC) facility in New Zealand. The tooling associated with Emirates Team New Zealand (ETNZ) recent Americas Cup win Bermuda was produced on the Jackson site. This included tooling for the foils, dagger boards and cyclors which contributed to the success of the team. Since January 2017 this facility has been operating 24 hours a day, 7 days a week producing parts for not only ETNZ but other high profile NZ companies including aerospace projects. This facility can operate continuously 24/7 for many weeks at a time.

Impacts of the EWL on Jackson Industries

6. Jackson Industries has serious concerns that the proposed construction of the EWL structures in close proximity to it's facility will have a significant impact on the accuracy, repeatability and reliability of the complex equipment that the business operates.

Vibration/Noise

7. The effects of vibration and noise, especially from construction of the EWL, are a concern to Jackson Industries.
8. In his evidence, Mr Jackson notes the evidence of the Auckland Council Expert, Mr Jon Styles on issues of vibration, and particularly his views that the effects of construction will be significant from retaining works near the Neilson Street interchange and the retaining and night works along the Southern Motorway.
9. Jackson Industries supports the views of Mr Styles that a draft Construction Noise and Vibration Plan (**CNVMP**) should be provided to demonstrate how the NZTA contractor will go about managing the construction noise and vibration effects during construction.
10. Jackson Industries also supports the views of Mr Styles that, in terms of operational noise, the NZTA assessment of noise effects remains incomplete.

Air Quality/Dust

11. Air pollution from road traffic currently has effects on the company vehicles. Because of location of the proposed elevated ramp, the EWL will actually bring the road closer to the premises of Jackson Industries and its vehicles. The EWL will make air quality and dust issues worse for Jackson Industries. During ETNZ occupation of the Jackson site a clean room was established to address air quality and dust issues during the construction of the boat's carbon parts.
12. As noted above, the company also owns very sensitive equipment, and has concerns that dust may affect that equipment, especially during EWL construction.
13. Jackson Industries supports the evidence of Auckland Council Expert, Mr Paul Crimmins that the adverse effects arising from discharges of contaminants into air from the construction could likely be addressed by a Construction Air Quality Management Plan (**CAQMP**) as required by the conditions of consent (which will include enhanced dust mitigation and monitoring measures to ensure that

offensive or objectionable dust effects do not occur). Jackson Industries would also like its site to be identified as an 'air pollution sensitive land use' in the CAQMP.

Vehicle Access

14. Jackson Industries has concerns that the EWL (both during construction and on completion) will severely compromise the daily transport requirements of Jackson Industries.
15. Jackson Industries engaged Mr Don McKenzie, a traffic expert to assist with these issues.
16. In his Evidence, Mr McKenzie says that the primary concerns of Jackson Industries relate to the construction and operation of the Neilson Street SH20 on-ramp, with particular regard to vehicle access to and from the site occupied by Jackson Industries at 18 Gloucester Park Road, Onehunga.
17. Mr McKenzie raises concerns he has about the effects of the Neilson Street On-ramp and the new cul-de-sac in Gloucester Park Road on the Jackson Industries site. He also raises concerns that the information that NZTA has provided does not satisfactorily confirm whether current levels and scales of vehicle access to the Jackson Industries site can be maintained.
18. In Mr McKenzie's opinion, conditions need to be included on the NOR to require full turns for all classes of vehicles from Gloucester Park Road both during construction and following completion of the Project.
19. In his rebuttal evidence for NZTA, Mr Nancekivell says:

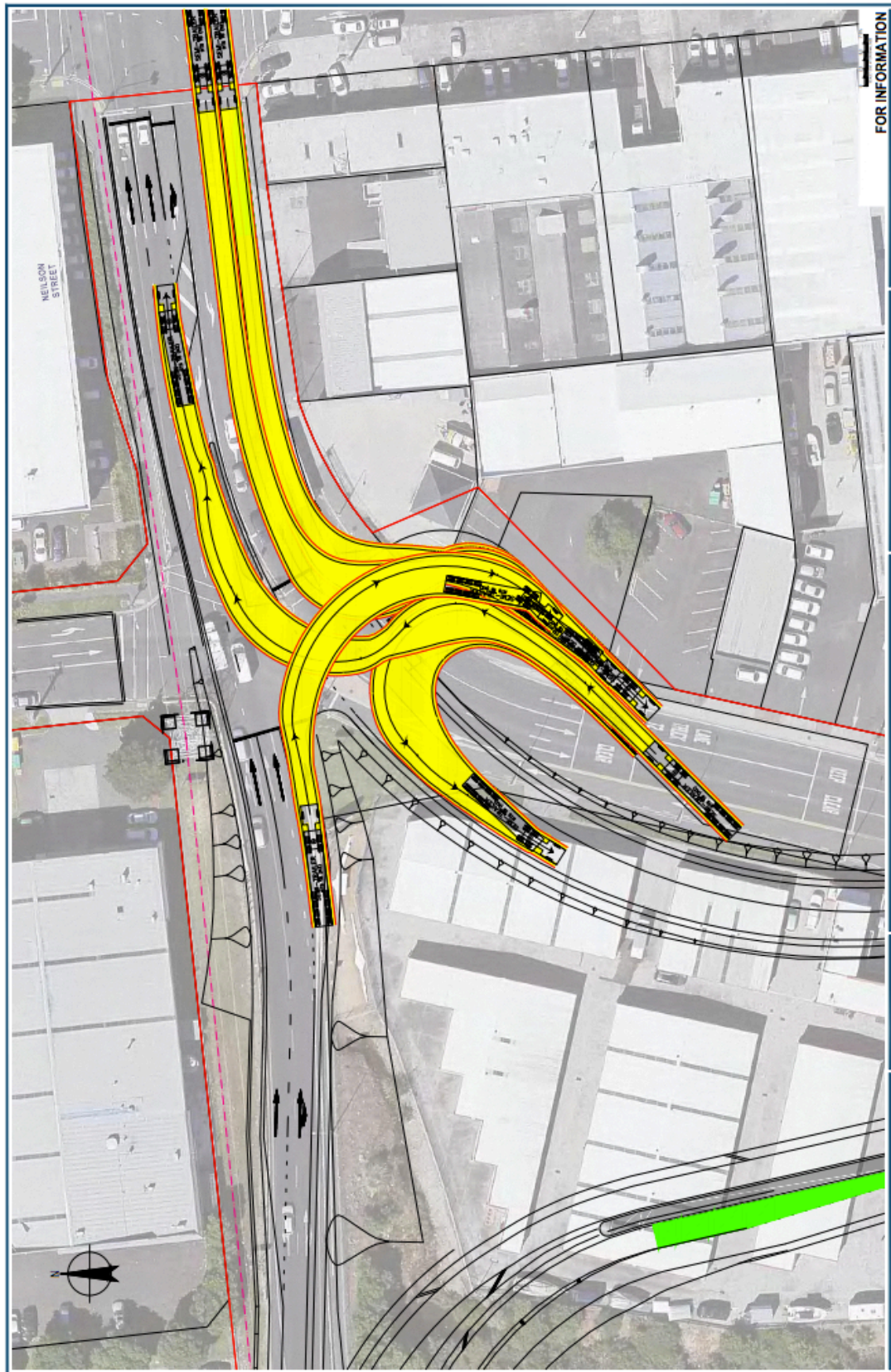
Jackson Electrical Limited– Mr Donald McKenzie

- 7.19 Mr McKenzie raises concern that the proposed layout for access to Jackson Electrical in Gloucester Park Road South will adversely affect the site operation, paragraph 4.5 to 4.7. I provide vehicle tracking curves at **Attachment E** which show trucks can enter and exit Gloucester Park Road South. We have not made any changes to the Jackson Electrical property so access is unchanged.
- 7.20 Mr McKenzie also raises concerns about access to properties on the western side of Gloucester Park Road South, paragraph 4.11. The only property that is on the western side of Gloucester Park Road South is being acquired for motorway purposes. Therefore, access to this site will only be undertaken under temporary traffic management for bridge maintenance, Transpower access to tower 31 and for landscape maintenance.

Jackson Electrical Industries Limited – Mr Jim Jackson

- 7.21 Mr Jackson raises concern, at paragraphs 52 to 61, about the proximity of the proposed EWL to Transpower tower 31. This tower is located in the property opposite his site in Gloucester Park Road south. I have discussed this in my EIC and in my response to Mr Jackson's submission. I also note that the design of the south bound on ramp has been adjusted to provide greater clearance from tower 31, this was shown on the revised drawings attached to my EIC (Drawing AEE-AL-102, REV 1, **Annexure F** to my EIC) Mr Jackson also raises concern regarding large truck access to his property. I have responded to this above in my response to Mr McKenzie
- 7.22 Mr Jackson has also proposed an additional access to Gloucester Park north off Selwyn Street also serving his property, paragraph 79 to 85. This is not seen as necessary for the EWL Project but Mr Jackson could raise this concept with Auckland Council.

19. Attachment E of Mr Nancekivell's Rebuttal Evidence is reproduced below:



20. Despite the assurances of Mr Nancekivell, Jackson Industries (through its expert Mr McKenzie) remain concerned that:

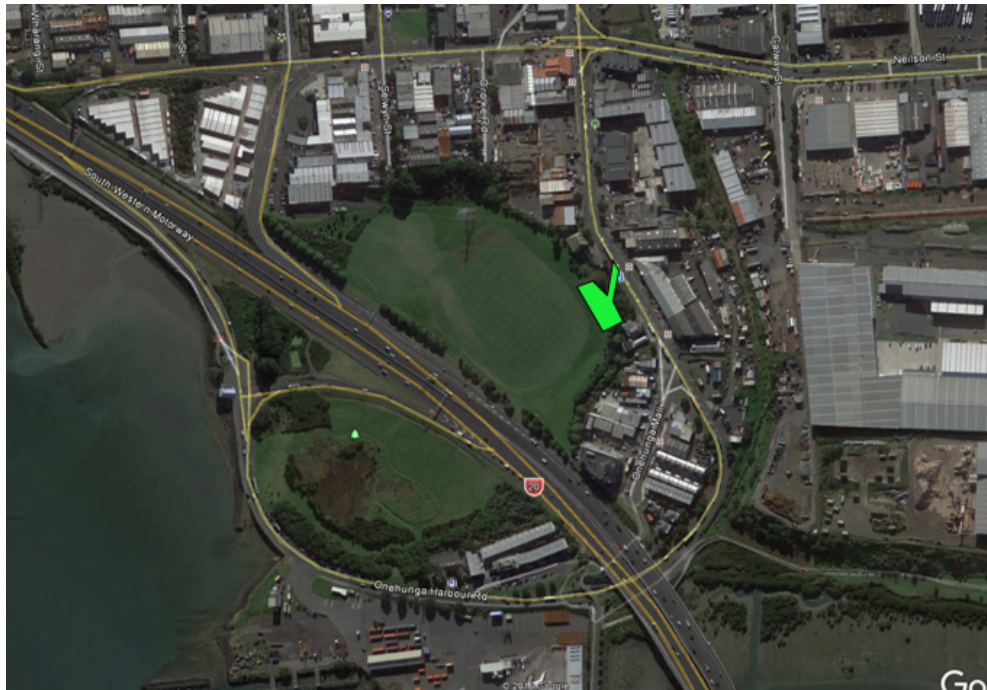
- Considering the NZTA swept path analysis it appears that there is an assumption that the existing Gloucester Park Road/on-ramp road reserve would be made available to the Jackson Electrical site and that the yellow swept paths assume that they will be able to use all of that site.
- The NZTA tracking path diagram appears not to take into account the specific tracking needed within/around the Jackson site
- The tracking undertaken is using an 18m semi-trailer vehicle. Typically a B-train (which are commonly used to service the Jackson Industries site) will have a less onerous tracking path than a semi-trailer shown in the tracking diagrams, but NZTA should be asked to consider and confirm the needs of all vehicles currently using the site
- NZTA haven't taken into account the level differences between the Jackson site and the adjacent on-ramp. The tracking analysis shows the vehicle tracking across the embankment/retaining wall current between the site parking area-access and Gloucester Park Road, which would be physically impossible.



- There does not appear to be sufficient space for the B-train trucks to complete a full 180 degree u-turn at the turning head provided without infringing on the Jackson site
 - If there is a further tracking analysis requested to be undertaken by NZTA then, Jackson Industries would like to emphasise that all existing/current trucks using the site would need to be shown around and into the Jackson Electrical buildings as per existing access routes or alternatively requiring NZTA to ensure that the gradient of access routes to/from Gloucester Park Road would need to be no steeper than currently.
21. Through Counsel, Jackson Industries have asked that a meeting be held between Mr Nancekivell and Mr McKenzie to seek to resolve these matters (with Mr Jackson present to explain any nuances concerning the Jackson Industries site).

Selwyn Street Access

22. The end of Selwyn St is an unformed road designed to provide pedestrian and vehicle access to Gloucester Park. Selwyn St was originally going to provide on-ramp access to SH20 from Neilson St.
21. For many years Gloucester Park has only had one access point, being at the Onehunga Mall, which has very limited on-site parking and virtually no parking on the adjoining Onehunga Mall roadway.



22. As the concerns regarding tracking distance limitations on the proposed EWL access road to service the Jackson Industries site were in doubt (and remain in doubt or may be unable to be resolved), Jackson Industries raised a proposal in its evidence that it would be possible to provide safe access for the 23m vehicles to enter and depart their site if Selwyn St was to be extended into Gloucester Park, thereby providing the missing link between its site and Selwyn St.



23. In addition, as there are currently no parking or toilet facilities in this area of the park, the extension of Selwyn St could resolve other issues, including the provision of public amenities (as it is close to a gravity sewer line).
24. The Gloucester Park area between Selwyn St and O'Rorke St is also a highly compromised area, containing demolition material such as scrap steel and concrete rubble (with exposed rebar). This area could provide vehicle parking for park users and overflow parking for the Onehunga Railway station, which has been at capacity for many years.



25. Although Mr Nancekivell (in para 7.22 of his Rebuttal Evidence) acknowledges this proposal, he says: “This is not seen as necessary for the EWL Project but Mr Jackson could raise this concept with Auckland Council.”

26. As the concerns regarding tracking distance limitations on the proposed EWL access road to service the Jackson Industries site are in doubt and may be unable to be resolved, Jackson Industries has again raised the proposed Selwyn St alternative with Counsel for NZTA and asked that it be treated more seriously by the Agency as mitigation for the reduced site access from Gloucester Park Road (if that proves to be the case).

Support for Submissions of TOES and others

27. Jackson Industries also fully supports Opening Submissions of TOES and others and the Onehunga Business Association.

Witnesses

28. Jackson Industries will be calling the following witnesses:
- Jim Jackson (Managing Director, Jackson Electrical Industries Ltd)
 - Donald John McKenzie “Don McKenzie” (Expert, Traffic)

Dated: 3 July 2017



Grant Hewison

Co-Counsel for The Onehunga Enhancement Society Incorporated; The Re-Think East West Link Society Incorporated; The Manukau Harbour Restoration Society Incorporated; Jackson Electrical Industries Ltd; and The Local Lockup Ltd/Scott Palmer