

**Before a Board of Inquiry  
Northern Corridor Improvements Project**

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Under the Resource Management Act 1991 ('the Act')

In the matter of a Board of Inquiry appointed under section 149J of the Act to consider notices of requirement for designations and resource consent applications by the New Zealand Transport Agency for the Northern Corridor Improvements Project

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**Rebuttal evidence of Andrew William Hale for the New Zealand  
Transport Agency (Construction)**

Dated 15 June 2017

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## **STATEMENT OF REBUTTAL EVIDENCE OF ANDREW WILLIAM HALE FOR THE NEW ZEALAND TRANSPORT AGENCY**

### **1 Qualifications and experience**

- 1.1 My full name is Andrew William Hale. I am an Associate at Aurecon in Auckland.
- 1.2 My qualifications and experience are set out in my Evidence in Chief ('**EIC**') dated 20 April 2017.
- 1.3 I repeat the confirmation that I provided in the EIC that I have read, and agree to comply with the Code of Conduct for Expert Witnesses 2014.
- 1.4 My rebuttal evidence relates to the resource consent applications and notices of requirement lodged by the New Zealand Transport Agency ('**Transport Agency**') with the Environmental Protection Authority ('**EPA**') on 14 December 2016 for the Northern Corridor Improvements Project ('**Project**').

### **2 Scope of evidence**

- 2.1 In this rebuttal evidence, I will address matters raised in the evidence of:
  - a Kiwi Self Storage Ltd – Corporate (evidence of Messrs Fraser and Trautvetter);
  - b Auckland Council – Public Open Space and Community Facilities (evidence of Ms Barrett); and
  - c Auckland Transport – Public Transport, Operational (evidence of Mr Maule).
- 2.2 The fact that this rebuttal statement does not respond to every matter raised in the evidence of submitter witnesses within my area of expertise should not be taken as acceptance of the matters raised.

### **3 Kiwi Self Storage Ltd – Corporate (evidence of Messrs Fraser and Trautvetter)**

- 3.1 This statement of evidence raises concerns, and suggests conditions, relating to:
- a Security and health and safety during construction;<sup>1</sup>
  - b Possible restrictions on vehicles turning from the middle roadway on the submitter’s site during construction;<sup>2</sup>
  - c Dust and other adverse amenity effects during construction.<sup>3</sup>

#### *Security and health and safety during construction*

- 3.2 The Transport Agency will be awarding the implementation stage of the Project to a sufficiently experienced constructor that has undertaken construction of similar sized projects recently on the Auckland motorway network. The constructor will be familiar with implementing health and safety procedures to ensure compliance with current health and safety legislation. The constructor will be mindful of the health and safety needs of both the construction staff and the public. The Construction Environmental Management Plan to be required by the resource consent conditions will also set out who can be contacted if there are any health and safety or security concerns.
- 3.3 The Transport Agency acknowledges that this site is currently is surrounded by a high fence with electrification at the top and that security is important to the storage operation carried out on site. I understand the Transport Agency is currently in discussions with Kiwi Self Storage about appropriate arrangements that can be put in place to satisfy its concerns in this regard and the agreement reached is likely to be recorded in an agreement between the parties.

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<sup>1</sup> Statement of evidence of Andrew McKenzie Fraser and Howard John Trautvetter for Kiwi Self Storage Limited, 25 May 2017, paragraphs 6.5, 6.11 and 8.1.

<sup>2</sup> Statement of evidence of Andrew McKenzie Fraser and Howard John Trautvetter for Kiwi Self Storage Limited, 25 May 2017, paragraphs 6.6 and 6.7.

<sup>3</sup> Statement of evidence of Andrew McKenzie Fraser and Howard John Trautvetter for Kiwi Self Storage Limited, 25 May 2017, paragraphs 6.8, 6.10 and 8.1.

*Restrictions on vehicle movement*

- 3.4 In response to paragraphs 6.6 and 6.7 of the evidence, the 1m wide strip of land required for the Project will be used for specific construction activities relating mainly to the placement of retaining wall panels and equipment (this will be dependent on the final design and construction methodology). These panels will be lifted in from the State highway side of the site. The 1m strip will be used by a scissor-lift or cherry picker to guide panels into position. The use of this area would be extremely limited as the panels are quick to lift into place. The units will not be inaccessible during this period as suggested. On site traffic management would ensure that vehicles are able to manoeuvre through the site as soon as any particular panel is set in place. There is no intention to block or restrict access to the western road.
- 3.5 Property rights to occupy this land will be negotiated with the landowner, and compensation paid for the temporary occupation. If it is necessary to use the 1m wide strip of land for more than the estimated 2-3 months, then this will be compensated for as part of those negotiations.
- 3.6 The property negotiations will also address matters such as reinstatement of fencing and asphalt, if it is necessary to alter these as a result of the Project.

*Dust and other amenity effects*

- 3.7 In response to paragraph 6.8 of the evidence, specific dust mitigation measures for the Kiwi Self Storage site can be detailed within the Dust Management Plan required by the proposed conditions. The proposed conditions require the Dust Management Plan to detail dust monitoring and mitigation to be carried out. In my view this plan will appropriately manage dust which could otherwise affect the Kiwi Self Storage site.
- 3.8 The evidence also raises concerns about construction noise, particularly if it could affect a manager which lives onsite.<sup>4</sup> This issue was addressed by **Ms Wilkening** in her evidence in chief regarding construction noise.<sup>5</sup>

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<sup>4</sup> Paragraphs 6.10 and 8.1 of Andrew McKenzie Fraser and Howard John Trauvetter's evidence for Kiwi Self Storage Limited, 25 May 2017.

<sup>5</sup> Paragraphs 12.47 – 12.49 of Ms Wilkening's evidence in chief (construction noise).

The proposed conditions require a Construction Noise and Vibration Management Plan, which will manage construction noise effects.

- 3.9 In my view the conditions proposed by the witnesses relating to noise, dust, sediment control, working hours and construction hoardings, fencing and cones are unnecessary.

**4 Auckland Council – Public Open Space and Community Facilities (evidence of Ms Barrett)**

- 4.1 Paragraph 7.44 of Ms Barrett's evidence states that it is important to understand the staging of construction of the new Paul Matthews Drive connection and works affecting the existing underpass connecting Rook Reserve and Omega Reserve across SH18. This is to better understand the impacts on pedestrian/cycle access across SH18 for the duration of the Project.
- 4.2 Temporary closure of the Alexandra underpass will be required to allow for the extension to the existing underpass structure. Sufficient diversion routes will be agreed prior to closure as part of the Construction Traffic Management Plan ('CTMP'). The temporary diversion will likely be to Caribbean Drive and/or Albany Highway.
- 4.3 It cannot be guaranteed that the new Paul Matthews Drive will be completed prior to works commencing on the Alexandra underpass extension. The construction methodology will only be known to this level of detail once the Transport Agency has awarded the implementation stage of the Project to a constructor. However, proposed condition CTMP 3(a) requires the CTMP to address the use of staging to allow some sections of the Project area to be kept open while others are being worked on. Proposed conditions CTMP 3(f) and CTMP 4(b) require specific consideration of effects on cyclists and pedestrians.

**5 Auckland Transport – Public Transport, Operational (evidence of Mr Maule)**

- 5.1 Mr Maule's evidence<sup>6</sup> raises concerns about works at Constellation and Albany Stations which have the potential to disrupt bus services.
- 5.2 I understand the Transport Agency intends to discuss and agree with Auckland Transport construction methodologies for both Albany and Constellation Stations so that disruption is limited as much as practicable. I disagree that a designation condition should cover this matter because it would be inflexible and prevent the appointed constructor from developing innovative methods of resolving this issue. The Transport Agency cannot begin works at the bus stations until it has the agreement of AT, and this is the appropriate method of regulating this issue.
- 5.3 Paragraph 7.12 of Mr Maule's evidence asks for clarification of whether the 3-6 month closure of the right turn into Paul Matthews Road is required under all possible designs and construction methodologies, or just the indicative design lodged with the EPA. Until a constructor is appointed, it is unknown what alternative designs might be adopted or what their effects may be. Alternative designs and construction methodologies could be accepted by the Transport Agency if they minimise the effects of the lodged design. Any alternative design will still need to comply with any designation and resource consents granted by the Board of Inquiry, or the constructor will need to change those planning approvals.



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**Andrew William Hale**

15 June 2017

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<sup>6</sup> Paragraphs 6.16, 7.16, and 7.17 of Andrew Maule's statement of evidence for Auckland Transport (Public Transport – Operational).