

**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 Paul Michael Glucina for the New Zealand  
Transport Agency (Corporate)**

Dated 15 June 2017

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## **STATEMENT OF REBUTTAL EVIDENCE OF PAUL MICHAEL GLUCINA FOR THE NEW ZEALAND TRANSPORT AGENCY**

### **1 Qualifications and experience**

- 1.1 My full name is Paul Michael Glucina. I am the Transport Planning Manager for Auckland and Northland at the New Zealand Transport Agency.
- 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 authority to give evidence on behalf of the Transport Agency.
- 1.4 My rebuttal evidence relates to the notices of requirement and resource consent applications 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 address matters raised in the evidence of:
- a Daniel Newcombe (Corporate) – Auckland Transport;
  - b Alastair Lovell (Planning) – Auckland Transport;
  - c Maylene Barrett (Open Space and Recreation) – Auckland Council;
  - d Mr Fraser and Mr Trautvetter – Kiwi Self Storage Limited;
  - e Peter Fogarty; and
  - f David Wilmott.
- 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.

2.3 My rebuttal evidence will also provide an update on the position in relation to the stormwater management pond options for Rook and Bluebird Reserves.

### **3 Daniel Newcombe – Auckland Transport (Corporate)**

3.1 Mr Newcombe notes that work is currently underway on a Framework Agreement that will set out the basis for AT's involvement in the detailed design and construction process.<sup>1</sup> As the ultimate recipient of the busway, bus station and shared use path components of the Project, it is critical that AT's requirements and standards are met. If they are not met, then AT may well refuse to take over the operation of these assets.

3.2 From the outset of this Project AT, as a project partner, has been very closely involved in the design of the Project, including not only the Project design but also the potential impacts of the construction and operation of the Project on the local road network, bus services and bus stations. AT has participated in weekly team meetings and various work stream meetings and been integrally involved in the design process.

3.3 **Mr McGahan's** evidence in particular explains some of the changes proposed to the conditions to address AT's concerns. Given AT's involvement in the Project as a project partner to date, and the Framework Agreement currently being put in place, arguably many of these conditions are unnecessary. However, I do not oppose the imposition of these conditions given that they are in line with the matters already agreed with AT during the Project development.

3.4 In paragraph 8.12 of his evidence, Mr Newcombe mentions the need to collaborate with AT on the design of the proposed Rosedale Bus Station.<sup>2</sup> Mr Newcome also suggests that the busway should be future proofed for a bus station at Rosedale. I wish to clarify that the matter of an additional bus station between Constellation and Albany Stations is still under investigation. Several options are currently being assessed and this process is unlikely to be complete prior to the end of the Board of Inquiry

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<sup>1</sup> Paragraph 8.6 of Mr Newcombe's evidence.

<sup>2</sup> This issue is also raised in paragraph 7.19 of Mr Maule's evidence.

hearing. Therefore, a condition requiring integration of the Project with a bus station at Rosedale is neither appropriate nor necessary.

#### 4 **Alastair Lovell – Auckland Transport (Planning)**

4.1 Mr Lovell identifies a number of transport projects and matters which he says should be provided for as part of the Project. These matters include:

- a Design of the busway to support future Mass Rapid Transit<sup>3</sup> – as set out in **Mr Moore's** evidence in chief,<sup>4</sup> the Project has been designed to accommodate a Mass Rapid Transit system. AT's continued involvement in the detailed design of the Project will ensure that the detailed design continues to meet this objective.
- b An upgrade of Rosedale Road to ensure the safe and efficient operation of the Rosedale Bus Station<sup>5</sup> – I have explained above that the location of any potential future bus station is yet to be decided and does not form part of this Project.
- c The provision of a number of SUP connections<sup>6</sup> – As set out in in **Mr Moore's** evidence, none of these connections are necessary to mitigate adverse effects generated by the Project.<sup>7</sup> **Mr Moore** explains that the Project does not preclude AT from implementing these connections in future if it considers it is desirable to do so.<sup>8</sup> **Mr Bray** notes that the SUP has been provided as a 'backbone or arterial link within the broader AT network', and is designed to allow future connections as needs arise and funding allows. The Transport Agency remains open to future discussions with AT about funding these types of connections. There is considerable scope to add to, and capitalise on, the Project currently being implemented in the future with a range of potential benefits from both a transport perspective and in terms of community connectivity. However, as for any project of this nature, the Transport Agency has to define the limits of the Project somewhere and in this instance it considers that

<sup>3</sup> Condition X.2(a) page 19 of Mr Lovell's evidence.

<sup>4</sup> Paragraph 8.6e of Mr Moore's evidence in chief.

<sup>5</sup> Condition X.2(a) page 19 of Mr Lovell's evidence.

<sup>6</sup> Condition X.2(e) to (g) page 20 of Mr Lovell's evidence. These connections are also discussed in the evidence of Ms King.

<sup>7</sup> Paragraph 7.3 of Mr Moore's rebuttal evidence.

<sup>8</sup> Paragraph 3.4 of Mr Moore's rebuttal evidence.

the current Project without the provision of the suggested additional SUP connections, will appropriately deliver its objectives.

- 4.2 Mr Maule and Mr Peake both raise issues about the effects of the Project on existing bus services during the construction period. As noted by **Mr Clark** in his rebuttal evidence, the Transport Agency and AT have been, and will continue to work closely together to minimise adverse effects of construction on buses.<sup>9</sup> Based on **Mr Clark's** conclusion it should be possible to construct the Project without closing the existing bus priority measures along the motorway,<sup>10</sup> I do not agree with Mr Maule's suggestion in paragraph 7.14 that the Transport Agency should pay for extra buses and bus costs during the construction period.

## 5 **Maylene Barrett – Auckland Council (Open Space and Recreation)**

- 5.1 **Mr Greenaway** addresses Ms Barrett's comments about the potential social and recreational effects associated with the loss of the land earmarked for future sports fields at Constellation Park. **Mr Greenaway** concludes that there is no adverse effect in this respect because sufficient land is already available to meet the projected demand in 2045 and in addition, the area vacated by the existing Hockey Stadium provides suitably zoned open space land for sports fields if deemed appropriate by Council.<sup>11</sup>
- 5.2 With regard to the quite separate issue of compensation for the loss of this land, I note the following:
- a Auckland Council's Finance and Performance Committee has approved the release of the land subject to receiving land within a geographic area encompassing Rosedale as well as parts of Albany, Paremoremo, Coatesville and Whenuapai or financial compensation equivalent to the value of any land lost.
  - b The Transport Agency has put forward an option for recreational land at Brighams Creek Road. Auckland Council has stated that it requires three months to consider this option.

<sup>9</sup> Paragraphs 4.2 and 4.10 of Mr Clark's rebuttal evidence.

<sup>10</sup> Paragraphs 5.1 of Mr Clark's rebuttal evidence.

<sup>11</sup> Paragraph 6.4 of Mr Greenaway's rebuttal evidence.

- c The Transport Agency has offered to assist with the process of finding other alternative land. This offer has been rejected by Auckland Council on the basis that it prefers that Panuku undertake the search.
- d The Transport Agency remains committed to working with Auckland Council to find a workable solution in terms of replacement land.

## **6 Mr Fraser and Mr Trautvetter – Kiwi Self Storage Limited**

- 6.1 Mr Fraser and Mr Trautvetter have requested changes to the Project design to ensure that the views into the site are not compromised. Having reviewed the appendices attached to Mr Land's evidence, **Mr Bray's** opinion is that the visibility of the Kiwi Storage site is not affected to the degree alleged by Mr Land. Vehicles travelling southbound have the best visibility at present, whereas those travelling northbound have very limited visibility. While **Mr Bray** accepts that the Project's structural changes will restrict visibility for vehicles directly adjacent to the site travelling southbound, the additional lanes, and the removal of existing (tall) planting will in fact increase visibility so that there is a prominent head on view.<sup>12</sup>
- 6.2 In addition, **Mr Moore** has reviewed the proposed design changes and concludes that whilst theoretically they are possible, they all require safety departures and would therefore compromise the design of the Project to some extent.<sup>13</sup>
- 6.3 After reviewing Kiwi Storage's evidence, and following further discussions with this submitter, the Transport Agency has concluded that the benefits of the lodged design for the busway and SUP outweigh any potential benefit to Kiwi Storage of the revised design.

## **7 Peter Fogarty**

- 7.1 Mr Fogarty raises a number of questions in relation to the Project. The majority of these questions are addressed by the expert witnesses for the Transport Agency. However, I wish to respond to the following matters:

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<sup>12</sup> Paragraphs 3.4-3.6 of Mr Bray's rebuttal evidence.

<sup>13</sup> Paragraph 6.6 of Mr Moore's rebuttal evidence.

- a Mr Fogarty queries who will maintain the northern SUP, and the fences/barriers and margins.<sup>14</sup> I confirm AT will be responsible for the maintenance of the SUP once built.
- b Mr Fogarty states that no reason has been provided as to why the westbound ramp (south facing) ramp at the SH18 interchange cannot be built now, except that NZTA decided not to construct it as part of this Project.<sup>15</sup> As outlined by **Mr Moore**, the Project does not preclude the construction of the south facing ramps in the future.<sup>16</sup> Similarly, the south facing ramps are not necessary to mitigate any adverse effects arising from the Project. As for any project of this nature, it is always possible to keep adding on components that will result in a transportation benefit. The Transport Agency considered that the current proposal adequately met the Project objectives and for that reason is not seeking authorisation to construct the south facing ramps at this time.
- c Mr Fogarty also queries why the Transport Agency is not fixing the issues on SH1 south of Constellation, that currently cause congestion.<sup>17</sup> The same reasoning applies as outlined above in relation to the south facing ramps.
- d Mr Fogarty argues that the Project does not complete the Western Ring Route without the construction of the south facing ramps or northern ramps at SH16 interchange.<sup>18</sup> I disagree with this statement. As stated in my EIC, the Project will complete the Western Ring Route, which will provide an alternative route from the airport towards the north.<sup>19</sup> The schematic diagram provided in Annexure A of my EIC clearly portrays the extent of the Western Ring Route, and the location of the Project in relation to this. The south facing ramps have been specifically designed so that they can be incorporated in the future.<sup>20</sup>

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<sup>14</sup> Section 3, page 5.

<sup>15</sup> Section 3, page 8.

<sup>16</sup> Paragraph 3.1 of Mr Moore's rebuttal evidence.

<sup>17</sup> Section 4, page 8.

<sup>18</sup> Section 8, page 19.

<sup>19</sup> Paragraph 1.4 of my EIC.

<sup>20</sup> Paragraph 4.3 of my EIC.

## **8 David Willmott**

8.1 Mr Willmott raises concerns that the Project does not address motorway congestion,<sup>21</sup> will not help with deterioration of inter-accessibility,<sup>22</sup> and does not address private vehicle user needs.<sup>23</sup>

8.2 I do not agree with Mr Willmott's comments. The benefits of the Project are set out in my EIC and include greater interregional network resilience and improved journey times across the wider area (for both private vehicles and public transport).<sup>24</sup> These elements form part of the Project objectives, and the Project has been designed in a way that ensures these objectives are met.

## **9 Stormwater management pond at Rook or Bluebird Reserves**

9.1 As outlined in the EIC for the Transport Agency, the proposal for a stormwater management pond at Rook Reserve is its preferred option in terms of:

- a Stormwater function;<sup>25</sup>
- b Recreation effects;<sup>26</sup>
- c Visual and landscape effects;<sup>27</sup> and
- d Social effects.<sup>28</sup>

9.2 Auckland Council has not raised any concerns about the location of the stormwater pond within Rook Reserve and discussions have been progressing relating to a concept plan being developed for the reserve. The principles of the concept plan are now proposed to be captured within the designation conditions.

9.3 Accordingly, the Transport Agency respectfully requests that the Board of Inquiry reduce the designation footprint within Bluebird Reserve to

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<sup>21</sup> Paragraph 1, page 1.

<sup>22</sup> Paragraph 2, page 1.

<sup>23</sup> Middle of page 5.

<sup>24</sup> Paragraph 9.1 of my EIC.

<sup>25</sup> Paragraph 14.11 of Mr Hughes' evidence in chief.

<sup>26</sup> Paragraph 7.30 of Mr Greenaway's evidence in chief.

<sup>27</sup> Paragraph 12.15-12.16 of Mr Bray's evidence in chief.

<sup>28</sup> Paragraph 13.7 of Ms Strogen's evidence in chief.

exclude the area previously identified for a stormwater management pond.



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**Paul Michael Glucina**

15 June 2017