

**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 Louise Strogon for the New Zealand Transport Agency (Social impact)**

Dated 15 June 2017

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## STATEMENT OF REBUTTAL EVIDENCE OF LOUISE STROGEN FOR THE NEW ZEALAND TRANSPORT AGENCY

### 1 Qualifications and experience

- 1.1 My full name is Louise Strogen. I am a Senior Environmental Planning Consultant at Aurecon New Zealand Limited (**'Aurecon'**).
- 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 Ms Joanne Hart, Auckland Council (Planning – Designation);
  - b Mrs Maylene Barrett, Auckland Council (Public Open Space and Community Facilities);
  - c Mr Peter Fogarty; and
  - d The report (Noise and Vibration Effects) of Mr Jon Styles for the Board of Inquiry.
- 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 I also will address the outcome of discussions with the Ministry of Education following review of my EIC and that of **Mr McGahan** in response to their submission.

### 3 Response to Auckland Council – Planning (Ms Hart)

- 3.1 Paragraph 15.3 of Ms Hart's evidence on behalf of Auckland Council states that amendments are required to the designation conditions to ensure that social needs, including recreational needs and amenity within the natural and physical environment of future generations, are met.
- 3.2 In particular, Ms Hart requests a new condition requiring the establishment of a Community Liaison Group ('**CLG**') with representation from a broad range of community interests.<sup>1</sup> Her proposed condition provides for the establishment of a CLG prior to the commencement of works, which will meet regularly during detailed design and construction phases in order to monitor effects, provide feedback on management and consultation plans, and propose potential joint initiatives with the Transport Agency. The condition would also require that the membership of the CLG consist of representatives from the Upper Harbour Local Board, iwi, recreation groups, Auckland Council representatives and council controlled organisations.
- 3.3 In paragraphs 16.3 and 16.4 of her evidence, Ms Hart comments on my amendments to condition SCP.3. She states that the amended condition SCP.3 is not clear regarding: what the opportunity for community input is expected to be; which management plans the community or stakeholders will be able to have input into; or how the input will be used by the Transport Agency.
- 3.4 I agree with Ms Hart that communication with potentially affected communities and businesses during both the detailed design and construction phases is important. However, a CLG is one of many tools available to achieve this outcome.
- 3.5 The Transport Agency has, in the past few months, revisited and reassessed how it engages with communities on its larger projects. The Transport Agency identified considerable benefits in adopting a more holistic approach to the detailed design and construction phase engagement by utilising a community strategy based on International Association for Public Participation guidelines. This strategy employs

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<sup>1</sup> Condition CLG.1, pages 51 to 52 of Ms Hart's evidence.

multiple interactions or consultation events.<sup>2</sup> By doing so, the input of a wider community audience is sought which is not necessarily achieved with a CLG as it follows a membership approach with a set format for interaction.

- 3.6 I consider the Transport Agency's community strategy approach would be a very effective engagement tool to keep the diverse communities located within the Project area informed about activities and provide mechanisms for particular concerns to be raised, and for methodologies to be considered and addressed during detailed design and construction.
- 3.7 I also note that CLGs are not precluded under the Charter approach put forward in proposed condition SCP.3(c)(iii) should feedback from the community events indicate a need for a CLG for any particular reason.
- 3.8 I consider that proposed condition SCP.3(b) already sets out a high level list of stakeholders with whom the Project will engage. In my view, it is not necessary to list every single organisation by way of condition. Through the development of the Charter noted above, a core invitee list to all consultation events and information days can be confirmed.
- 3.9 The purpose of the community strategy is to gain feedback on how Project effects are to be and are being managed (e.g. the management plans) and addressed during the detailed design and construction phases as well as responding to questions and providing project briefings. To make this outcome clearer, my recommendation is that proposed condition SCP.3(c) is amended to include a requirement for the production of a report to be provided to the Council and meeting attendees. The report should summarise the main points arising from each consultation event, reporting on any social impacts of the Project, along with recommendations on the measures to mitigate those effects. The amended condition is attached as Annexure A of **Mr McGahan's** rebuttal evidence.
- 3.10 In post submission discussions with Ms Hart, she also advised that Council seeks continued engagement with the stakeholders and the community for a given period following construction completion to capture

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<sup>2</sup> NZ Transport Agency Public Engagement Guidelines 2017

feedback on the early days of operation. While it is a normal course of action for the Transport Agency, under its environmental and social responsibility policy to undertake this type of engagement, I recommend that proposed condition SCP.6 is amended to confirm that the implementation of the SCP is continued for a period of 6 months following completion of construction. This amendment is shown in Annexure A of **Mr McGahan's** rebuttal evidence.

#### **4 Response to Auckland Council – Public Open Space and Community Facilities (Ms Barrett)**

4.1 Ms Barrett identifies in her evidence at paragraph 7.52 that a shared path link across SH18 between Bluebird Reserve and William Pickering Drive is shown in the Upper Harbour Greenways Plan but is missing from the Project. She states that this is an important connection which would enhance alternative pedestrian and cycling transport options for the Unsworth Heights community to the west of Rook Reserve.

4.2 The Greenways Plans are visionary plans which seek to guide the future planning of walking, cycling and ecological connections across the region. As such, no design feasibility work has been undertaken by Council to inform the proposed connections outlined in the plans. As noted by **Mr Moore**, the design of the Project does not preclude the provision of future SUP connections if deemed desirable by the Council.<sup>3</sup>

4.3 I agree that additional north-south pedestrian and cycle routes across SH18 over the current level of provision would provide additional connectivity and therefore, social benefit with respect to access and integration for the Unsworth Heights and North Harbour communities. However, the Project does not change the existing level of connectivity across SH18. In addition, as **Mr Moore**<sup>4</sup> and **Mr Schofield**<sup>5</sup> explain in their rebuttal evidence, the topography of the SH18 corridor, proximity of residential and business properties and reserve land to the motorway, CPTED (Crime Prevention Through Environmental Design) matters, as well as road safety requirements for the motorway, are all constraints on

<sup>3</sup> Paragraph 3.4 of Mr Moore's rebuttal evidence.

<sup>4</sup> Paragraph 11.7 of Mr Moore's rebuttal evidence

<sup>5</sup> Paragraph 4.10 of Mr Schofield's rebuttal evidence

any potential additional provision of access across SH18. The Bluebird Reserve and William Pickering Drive location is one such area along the corridor subject to a number of constraints which would prevent the provision of either a bridge or underpass in this location.

## **5 Response to Auckland Council – Landscape and Urban Design (Mr Brown)**

- 5.1 In his evidence Mr Brown also raises the matter of connectivity along SH18.<sup>6</sup> I agree that the more connected an area is, the more social benefits there are in terms of access and integration. I appreciate the social contribution that connectivity makes to an area and the desire to provide as many linkages as possible. However, the development of such connections needs to be balanced with other considerations and constraints as outlined above at paragraph 4.3.
- 5.2 The Project team has explored various options to achieve additional pedestrian and cycle links over and above those proposed in the lodged design. I understand that the northern alignment of the SUP along SH18 would not eliminate the option for an SUP on the southern side in the future, whereas progressing a southern alignment now would eliminate any future possibility. Therefore, from a social outcomes perspective the proposed northern SUP provides the spine for a new SUP network. The design does not preclude future connections should Council consider them desirable when it further develops this network. In this way, both the current and future potential connectivity of the SUP provides a significant social asset.

## **6 Response to Mr Fogarty**

- 6.1 Mr Fogarty states that he disagrees with my conclusion that on balance the social effects of the Project will be positive.<sup>7</sup> He states that the travel time improvements for some road users do not outweigh the negative social effects on the businesses and industries, North Harbour Hockey, and Unsworth Heights businesses and residents. He does not provide any

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<sup>6</sup> Paragraphs 16 to 23 of Mr Brown's evidence.

<sup>7</sup> Section 7, page 19 of Mr Fogarty's evidence.

information as to what kinds of social effects he considers the Project will generate or the extent of those effects.

- 6.2 I do not share Mr Fogarty's opinion that the negative social effects on the businesses and industries, North Harbour Hockey, and Unsworth Heights businesses and residents, outweigh the social benefits which the Project will provide. For the reasons set out in my EIC, I remain of the opinion that with the implementation of the proposed mitigation measures required by the conditions of consent, on balance the social effects of the Project will be positive.

## **7 Response to Mr Styles, Board of Inquiry Advisor (Noise and Vibration Effects)**

- 7.1 In his report to the Board of Inquiry, Mr Styles raises the matter of temporary relocation of residents as a consequence of noise and vibration effects and states that he considers that the potentially disruptive effects of the actual relocation have not been adequately considered.<sup>8</sup>
- 7.2 In my EIC at paragraph 9.1, I acknowledge that construction works can be socially disruptive and present an annoyance to the surrounding community, depending on how well they are managed. Best practice measures to reduce the anticipated short term construction noise and vibration effects and in turn the need for temporary relocation are highlighted in **Ms Wilkening's** rebuttal evidence.<sup>9</sup>
- 7.3 From a social perspective, early consultation and communication with affected residents is key so that, well in advance, an agreed tailored plan can be put in place for any necessary relocation and reoccupation of their homes. This approach reduces associated stress and disruption although, I appreciate some parties may still have residual anxiety as their 'norm' is altered for a short period.

## **8 Ministry of Education post submission discussions**

- 8.1 During recent discussions with the Ministry of Education ('**Ministry**'), they confirmed that the proposed amendments to Condition SCP.2 and SCP.3

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<sup>8</sup> Section 2.3 of Mr Styles' report.

<sup>9</sup> Paragraph 3.10, Ms Wilkening's Rebuttal Evidence

are acceptable. However, they have requested engagement with the Ministry on the Construction Traffic Management Plan.

- 8.2 On this basis an amendment to proposed condition CTMP.4(b) is proposed to ensure that access to education facilities is not compromised during the Project's construction phase as follows:

*As far as practicable, include measures to avoid road closures and also the restriction of vehicle, cycle and pedestrian movements, in particular, the restriction of cycle and pedestrian connectivity to schools in relation to which consultation with Ministry of Education should be undertaken.*

## 9 Conclusion

- 9.1 I remain of the opinion that from a social perspective, the Project will result in significant net social benefits largely due to the improvements to regional and local road networks, active transportation networks and linkages between existing places above the current situation.



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**Louise Strogon**

15 June 2017