

BOARD OF INQUIRY
HAUĀURU MĀ RAKI WIND FARM PROPOSAL

In the matter of the Resource Management Act 1991

And

In the matter of resource consent applications by Contact Wind Limited in respect of the Hauāuru mā raki Wind Farm Proposal

And

In the matter of notices of requirement and a resource consent application by Contact Energy Limited for transmission infrastructure related to the Hauāuru mā raki Wind Farm Proposal

REBUTTAL EVIDENCE OF RICHARD STEPHEN GALLOWAY

Counsel Instructed:
Trevor Robinson
Wellington

Tel 64-4-472 1755. Fax 64-4-472 1766. PO Box 8018 Wellington
trobinson@xtra.co.nz

Solicitor Acting:
H Rosemary Dixon
Contact Energy Limited

Telephone 64-4-462 1284. PO Box 10742, Wellington
rosemary.dixon@contact-energy.co.nz

Introduction

1. My name is Richard Stephen Galloway. I am a Senior Traffic Engineer with Traffic Design Group Limited based in Lower Hutt.
2. I refer the Board of Inquiry to the statement of my qualifications and experience in my evidence in chief. I reaffirm my commitment to comply with the code of conduct for expert witnesses in the Environment Court.
3. The purpose of this brief of evidence is to respond to the evidence of Mr Gray on behalf of Waikato and Franklin District Councils, Mr Kiernan on behalf of himself, and the submissions and evidence of Sir William Birch, Mr Wright and Mr Spencer on behalf of Sunset Views Limited and Rimanui Farms Limited.

Evidence of Mr A D A Gray

4. Mr Gray's evidence summarises the discussion and agreement that has occurred since my evidence in chief was circulated. I agree with all of Mr Gray's recommended changes to the suggested conditions of consent.
5. For completeness, I note that Mr Gray inadvertently omitted one of the changes in his strike-through version at Appendix 2. That change, which is described in the body of his evidence, and in his Appendix 1, is to delete the words "*calculation of the financial contribution*" from Condition 7.14.

Evidence of Mr S F Kiernan

6. At paragraph 23 of his evidence Mr Kiernan raises the issue of whether or not Churchill Road is capable of accommodating the construction traffic associated with the Orton switchyard. The construction traffic associated with this aspect of the project will be relatively light. Based on the quantities contained in the Beca Hauāuru mā raki - Waikato Wind Farm Project Description Report, I anticipate daily traffic flows in and out to comprise eight truck movements per day during the 9-12 months of construction. I have assessed Churchill Road as being readily capable of accommodating this level of traffic without adversely affecting the safety and efficiency available to other users.
7. Furthermore, the existing users of Churchill Road will be provided with greater detail of construction sequencing and operating hours once the Construction Traffic Management Plan is prepared at the detailed design stage.

Evidence of Mr H Spencer

8. Mr Spencer suggests that the locations on Port Waikato-Waikaretu Road where road improvements have been indicated as being necessary for accommodating the blade trailers are insufficient and that a “total upgrade” of the road is required. I first note that Franklin District Council has been gradually upgrading this road with approximately 1km of seal extension occurring each year. The upgraded portions generally consist of a 6m sealed carriageway which is appropriate in this location where the topography requires generally low speeds.
9. Notwithstanding the fact that upgrades have already taken place, I acknowledge that some further works, particularly in regards to retaining unstable cut faces, will be required. A significant amount of detailed work will be required to identify the exact locations and extent of those works, and as such they are proposed to be undertaken at the detailed design stage in the preparation of the Pavement Bridge Rehabilitation and Maintenance plan.
10. I acknowledge Mr Spencer’s comment that the road is a lifeline for the community and needs to remain open at all times. The traffic management measures proposed for the project will ensure this occurs.

Evidence of Mr L Wright

11. Mr Wright suggests in his Section 12 that “*only the minimum amount of upgrade is proposed to the road*” accessing Sunset Station. This is not so, as the consent conditions clearly require that the net effect of the Wind Farm’s construction on district roads is nil or better. This is a significant undertaking on the part of Contact Wind and will require substantial investment in strengthening unstable slopes and weak pavements along Port Waikato- Waikaretu Road. This will be required to ensure that the road is maintained to Council’s usual standards in accordance with the suggested conditions. The reality of such an undertaking for the relatively large increases in truck traffic on what is currently a very lightly trafficked road are that the end result will be a significantly improved pavement surface, to the advantage of the community.
12. Mr Wright suggested no provision has been made for the management of dust. Such a provision has in fact been made in suggested consent Condition 7.2(e) which is “*measures to minimise the effects on houses along Port Waikato-Waikaretu Road caused by dust arising from construction traffic, including the use of dust suppressants or sealing past farm houses*”.
13. I consider that this aspect of the Pavement Bridge Rehabilitation and Maintenance Plan will be sufficient to ensure that dust nuisance does not occur from construction traffic.

Submissions/Evidence of Sir William Birch

14. At line 391 Sir William Birch notes a concern relating to interference with school bus timetables. I am however able to confirm that no such interference is anticipated, as suggested consent conditions 7.3(e) and 7.9 are specifically provided to ensure priority remains for school buses.
15. At line 408 Sir William Birch notes a potential difficulty associated with moving stock along or across the road. As I described in paragraphs 164 and 165 of my evidence in chief, options do exist to improve the safety and convenience available to farmers through the provision of manually controlled flashing beacons and communication arrangements. My recommendations in this regard are given effect by suggested Conditions 7.3(f) and (g).
16. At line 450 Sir William Birch suggests that the “*precarious nature of roads*” is not recognised in these suggested conditions. In my view they are, as the Pavement Bridge Rehabilitation and Maintenance Plan requires a detailed investigation of these sections of road, and works are to be undertaken to ensure they are maintained to the District Council’s usual standards.
17. Sir William Birch’s line 475 claims that “*no evidence has been offered by the applicant to suggest that there would not be increased visitor numbers wishing to visit the proposed wind farm*”. I did in fact provide evidence in paragraph 182 of my evidence in chief stating that “*traffic counts undertaken at other wind farm sites suggest an average of up to 130 cars may visit the wind farm each day during the initial construction period, tailing off to just occasional visitor traffic in the longer term*”. The most reliable and helpful piece of data in assessing visitor traffic comes from Meridian’s Te Apiti Wind Farm on the northern side of the Manawatu Gorge. A traffic counter was installed at their visitor centre so as to provide an accurate record of visitor numbers.
18. The traffic count information from Saddle Road (which passes through the Te Apiti Wind Farm) provided in Sir William Birch’s Appendix C requires some care in interpretation. To assist in this I have spoken to Manawatu District Council’s Roothing Manager and found that the 133 vehicle per day figure indicated as applying to 2002/2003 is actually an old figure that was either counted or estimated prior to 1997. The figures through the following three years (of which I note there was no actual count in 2005/2006) are not particularly helpful as they include periods where Saddle Road was closed due to a bridge washout, periods where Manawatu Gorge Road was closed due to significant and long enduring slips and general wind farm construction traffic. Overall, the figures actually suggest a 40 vehicle per day increase over the period of ten years, and even that requires some care in its application. I therefore remain of my original view that

visitor traffic may average 130 cars per day during construction and just occasional traffic in the longer term.

19. At line 520 Sir William Birch expresses concern about the rights of land owners to know in advance how proposed road widening may affect their land. I note in this regard that a resource consent does not confer any right on the applicant to enter or undertake work on anyone else's land unless they agree. The submitters will therefore be able to determine the extent to which road widening works extending beyond the road reserve boundary will affect their land before they agree to it being undertaken.
20. At line 557 Sir William Birch suggests that the applicant should be required to upgrade the alignment of Port Waikato-Waikaretu Road as well as reducing its susceptibility to regular slips. The susceptibility to slips will be addressed as part of the Pavement, Bridge Rehabilitation and Maintenance Plan in regard to ensuring sufficient strength exists to accommodate the heavy vehicles anticipated. From my assessment however there is no need for a wide scale realignment of the road in order to accommodate the forecast traffic levels.
21. Sir William Birch provides a summary of six key issues beginning at line 562 which I respond to as follows:
 1. Port Waikato-Waikaretu Road requires upgrading for the proposed construction traffic - as I described the road is capable of accommodating the traffic safely although it will require works to strengthen and maintain the pavement and adjoining slopes;
 2. *"excessive road closures will be required"* - no road closures are envisaged for the purpose of constructing the wind farm. Road improvement works will instead be undertaken with temporary traffic management;
 3. *"it is not possible for trucks to negotiate without crossing the centreline"* - the low speed values on the road enable trucks to operate safely. I note that communication arrangements will further improve safety for school children;
 4. the test run vehicle *"had great difficulty negotiating this length of road"* - the dry run undertaken as part of my assessment did indeed encounter a number of locations where road improvements are required. These are all detailed in my evidence in chief with widening proposed as appropriate;
 5. *"power and telephone services... will be jeopardised"* - underground services are specifically provided for in Condition 7.2(b);
 6. *"the only alternative... will be Baker Road"* - I agree that Baker Road is not a practical alternative and so Port Waikato-Waikaretu Road will remain open to all vehicles.

22. Overall, and while traffic levels on Port Waikato-Waikaretu Road will change markedly during the two year period of Stage 1's construction, it is my opinion that the staff, families and visitors to Sunset Station and other properties along Port Waikato-Waikaretu Road will continue to have safe access to their land with no more than a minor change to the levels of convenience enjoyed at present.

R S Galloway