

IN THE MATTER OF

the Resource Management Act 1991

AND

IN THE MATTER OF

Notices of requirement for designations under section 168 of the Act, in relation to Te Ahu a Turanga; Manawatū Tararua Highway Project

BY

NEW ZEALAND TRANSPORT AGENCY
Requiring Authority

**ADDENDUM TO STATEMENT OF EVIDENCE OF
ANDREW MARK WHALEY (PROJECT DESIGN) ON BEHALF OF THE
NEW ZEALAND TRANSPORT AGENCY**

25 March 2019

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INTRODUCTION

1. My name is **Andrew Whaley**.
2. I submitted a statement of expert evidence on Project Design matters ("**EIC**") on behalf of the New Zealand Transport Agency ("**Transport Agency**") dated 8 March 2019.
3. I have the qualifications and experience set out in my EIC.
4. I repeat the confirmation given in my EIC that I have read the 'Code of Conduct' for expert witnesses and that my evidence has been prepared in compliance with that Code.
5. In this addendum I use the same defined terms as in my EIC.
6. In this addendum to my EIC, I respond to points made in the expert evidence of:
 - (a) Bridget Robson on behalf of AgResearch Limited ("**AgResearch**"); and
 - (b) Paul Botha and Tony Keyte on behalf of Meridian Energy Limited ("**Meridian**").

RESPONSE TO EXPERT EVIDENCE

Response to evidence of Bridget Robson for AgResearch

7. Mrs Robson in paragraph 29 of her evidence asserts that "*The consideration of alternative routes in Mr Whaley's evidence fails to identify the biophysical effects on Ballantrae of a road cutting passing through it (...)*"
8. This is correct in so far as my evidence focused on the consideration of practical alternatives to avoid and/or minimise the effects on the Ballantrae site. Avoidance, which I understand to be sought by AgResearch, would require an alignment to the south which I consider impractical, as discussed in paragraphs 163 to 168 of my evidence (in response to Mr Cory Matthew's suggested alternative alignment).
9. Biophysical effects are discussed in the evidence of Dr Horne and Mr Morton.

Response to evidence of Paul Botha and Tony Keyte for Meridian

10. Mr Botha, at paragraph 20 his evidence, refers "Meridian's current consent for the Te Apiti wind farm allows for the 55 turbines to be located within 100 m of their consented locations. Meridian would like to continue to maintain the flexibility granted in that consent and therefore considers that a 60 m construction buffer be added to the 100 m turbine location allowance to

create a turbine contingency zone of 160 m from the original consented locations.”

11. This is discussed in my response to the Panel's fifth minute in paragraphs 16 to 18.
12. Mr Keyte in his evidence discusses the access implications associated with the new alignment and the provision of the underpass to retain connectivity to the northern and southern elements of the Wind Farm, including recommending over dimension access being provided directly off the highway (eastbound) to the northern side.
13. Access to the Wind Farm is currently from Saddle Road. There is no change to the provision of access off Saddle Road and, as such, no change or reduction in access to the northern side (north of the new highway alignment) of the Wind Farm. Indeed, access from Saddle Road will be improved with the Project, as traffic will revert to very low volumes. Direct access off the highway eastbound is therefore not required.
14. Access to the south of the new highway is proposed via an underpass off the existing access road network. Specific sizing has not been finalised as part of the indicative design, with this to be agreed as part of the ongoing engagement between the Transport Agency and Meridian. Mr Keyte has recommended an underpass size of 6m wide by 5m high and it is my understanding that the Transport Agency has progressed design on the basis of an internal width of 6m and height of 4.9m.
15. I consider this size to be sufficient to accommodate transportation of anticipated plant and material loads required for maintenance and operation of the existing Wind Farm. It is however insufficient for access in a repowering or tower replacement scenario. As such, access to the south of the new alignment (westbound) is required for the largest anticipated vehicles and loads. This is provided adjacent to TAP27. Mr Keyte suggests the provision of localised widening and a central barrier gate at this location. Widening is not considered necessary as the delivery of over dimension loads need to be undertaken under positive traffic management with arrangements considerably improved over the existing access off Saddle Road. The centre barrier gate is also not considered necessary given the low volumes/occasional usage and could encourage increased usage for routine operations.

16. Mr Keyte raises concern about long term access for over dimension vehicles to TAP23 on the northern side of the alignment and has suggested a northern access opposite TAP27. This is considered undesirable with upgrades to Cook Road off Saddle Road being more appropriate. This will be a matter for further discussion between the parties.
17. Mr Keyte recommends that should the internal access road for the southern side of the Wind Farm extend to TAP02, then the suggested over dimension access off the highway at approximate chainage 5850 would not be required. I agree with this assessment.

Andrew Whaley

25 March 2019