

Before Hearing Commissioners

under: the Resource Management Act 1991

in the matter of: notices of requirement and resource consent applications by the NZ Transport Agency and Hamilton City Council for the Southern Links Project

Rebuttal evidence of Linda Chamberlain (Social Impact Assessment) on behalf of the **NZ Transport Agency and Hamilton City Council**

Dated: 8 July 2014

Hearing date: 21 July 2014

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**REBUTTAL EVIDENCE OF LINDA CHAMBERLAIN ON BEHALF OF THE
NZ TRANSPORT AGENCY AND HAMILTON CITY COUNCIL**

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INTRODUCTION

- 1 My full name is Linda Louise Chamberlain.
- 2 I have the qualifications and experience set out in paragraphs 3 to 5 of my statement of evidence-in-chief (*EIC*) dated 12 June 2014.
- 3 My rebuttal evidence is given in support of notices of requirement (*NORs*) and applications for resource consents lodged by the NZ Transport Agency (*the Transport Agency*) and Hamilton City Council (*HCC*) on 9 August 2013 in relation to the construction, operation and maintenance of the Southern Links Project (*Project*).
- 4 I repeat the confirmation given in my *EIC* that I have read and agree to comply with the 'Code of Conduct for Expert Witnesses' contained in the Environment Court Practice Note 2011.
- 5 In this statement of rebuttal evidence, I respond to the relevant sections of evidence of the following submitter:
 - 5.1 John Olliver (Planning), on behalf of Titanium Park Joint Venture (*TPJV*) (38) and Waikato Regional Airport Limited (*WRAL*) (55).
- 6 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. Rather, I rely on my earlier technical report Hamilton Southern Links Social Impact Assessment (*SIA*), my *EIC* and this rebuttal statement to set out my opinion on what I consider to be the key Social Impact matters for this hearing.

RESPONSE TO EXPERT EVIDENCE OF SUBMITTERS

John Olliver (TPJV and WRAL)

- 7 I have read the evidence of Mr Olliver. I do not agree with Mr Olliver's statement at paragraph 6.6(d) that TPJV will not benefit from the overall improved access and connectivity provided by Southern Links.
- 8 Access and connectivity issues are a social effect. For this Project, I confirm that I have considered if the Project would prevent or compromise TPJV's access to the roading network.
- 9 In para 2.28(d) of his evidence, Mr Olliver states that he disagrees with the statement in the *SIA* that there are "overall benefits to business through the improvement in access and connectivity" and

that the SIA fails to identify the business effects of the disruption of access to the Western Precinct.

- 10 I am of the opinion that once constructed, the Project will offer economic benefits to the Titanium Park Industrial Park through improved access, visibility and connections to the Airport and the regional transportation network.
- 11 I am aware however that the Project is unlikely to be built for some time, and that Mr Olliver is referring to the "disruption of access", which he argues is caused by the Project.
- 12 I have therefore considered if in the short term, the Project would prevent or compromise access from the Western Precinct to the roading network. Mr Dowsett and Mr Eccles explain in their rebuttal evidence that the Project will not preclude TPJV from providing access to its Western Precinct via the mid-point access, as provided for in the Titanium Park Structure Plan.
- 13 I also understand that the Transport Agency and TPJV are continuing to engage to try to "fast-forward" a mutually agreeable interim access arrangement at the State Highway 3/21 intersection, and I support those efforts continuing. From my reading of Mr Eccles' and Mr Dowsett's rebuttal evidence, I understand that timing of the provision of interim access is the primary concern for TPJV. However if an interim solution cannot be found or fast-forwarded quickly enough, I understand that TPJV could elect to develop its mid-point access to enable development of the Western Precinct.
- 14 As the Project does not in fact prevent access to the Western Precinct, I do not agree with Mr Olliver that the Project has a social effect on the community by providing delayed socio-economic benefits, as a result of uncertainty and delay to access to TPJV's land.

CONCLUSIONS

- 15 I have read the statements of expert evidence provided by submitters relevant to my area of expertise. This evidence has not caused me to depart from the opinions expressed in my EIC, and I reconfirm the conclusions reached in my EIC.

Linda Chamberlain

8 July 2014