

**IN THE MATTER** of the Resource Management Act 1991

**AND** Notices of Requirement by **AUCKLAND  
TRANSPORT** pursuant to section 168 of the  
Act to the Auckland Council relating to the  
proposed City Rail Link in Auckland

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**EVIDENCE OF VAUGHAN SMITH ON BEHALF OF  
FOODSTUFFS (AUCKLAND) LIMITED**

**Dated: 26 July 2013**

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## **INTRODUCTION**

### **Qualifications and Experience**

1. My name is Vaughan Arthur Smith. I hold the qualifications of Master of Planning Practice (First Class Honours) and Bachelor of Engineering (Civil) from the University of Auckland. For the past six years I have been a Director of Bentley & Co. Limited, town planning and resource management consultants.
2. Since the completion of my MPlanPrac degree in 2004, my experience as a planner has encompassed a wide range of projects with an emphasis on the preparation of resource consent and plan change applications for retail and mixed use development. In 2007 I was accepted as a full member of the New Zealand Planning Institute.
3. Prior to becoming a planner I worked for 15 years as a manager on major property development projects. For much of that time I worked on the initial phase of projects, with RMA processes playing a large part. The most significant project in this regard was the redevelopment of Sylvia Park, Mount Wellington where a large component of my role was the management of the rezoning process for the site over a three and a half year period. My experience managing development projects has provided a strong foundation for my current career as a planner.
4. In preparing this evidence, I have complied with the code of conduct for Expert Witnesses in the Environment Court Consolidated Practice Note. This evidence is within my area of expertise, except where I state I am relying on what I have been told by another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

### **Scope of Evidence**

5. I appear in connection with the submission lodged by Foodstuffs (Auckland) Limited ("Foodstuffs") in relation to Notices of Requirement by Auckland Transport relating to the construction and operation of the City Rail Link ("CRL") project. The submission relates to the operation of a New World supermarket ("New World") located at 125 Queen Street. Deliveries, and other servicing, take place within a loading dock accessed from Albert Street via Swanson Street and Mills Lane.

6. In my evidence I will firstly summarise the submission made by Foodstuffs. I will then address the adverse effects of the Project on the New World supermarket and other elements of s171 of the RMA. Finally, I will discuss the response of Auckland Transport in relation to those potential effects, and the appropriateness of that response, and I will conclude with my views on the most appropriate way of addressing potential adverse effects on Foodstuffs.
7. In preparation for writing this statement of evidence I have reviewed those sections of: the Notices of Requirement and the accompanying reports, the Council's s42 report, and evidence prepared on behalf of Auckland Transport, that are relevant to the concerns of Foodstuffs. I have also reviewed the evidence of the witnesses presenting evidence on behalf of Foodstuffs to this hearing. I am familiar with Albert Street and the surrounding area and with the location of New World and the associated servicing arrangements.

### **Key Conclusions**

8. I have reached the following broad conclusions in this statement of evidence:
  - New World will potentially be directly affected by the proposed construction works on Albert Street for the CRL. These effects can be mitigated by imposing appropriate conditions on the designation if it is recommended that it be confirmed.
  - Inadequate consideration has been given to the use of tunnelling rather than a cut and cover construction methodology along Albert Street, and to maintaining north-south as well as east-west traffic movements at the key intersections during the construction phase.
  - The proposal for constructing the cut and cover section of the CRL in Albert Street will cause unacceptable traffic congestion in the City Centre. Withdrawal of Notice of Requirement 1 should therefore be recommended unless a condition is imposed that requires the use of tunnelling rather than cut and cover construction methodology along Albert Street, and providing for traffic movements in both directions at the key intersections during the construction period.

## SUBMISSION BY FOODSTUFFS

9. In its submission on the Notices of Requirement, Foodstuffs raised concerns about the adverse effects on the operation of New World arising from the construction of the CRL along Albert Street. The matters of concern to Foodstuffs fall into three categories: transport effects, vibration effects and the proposed use of management plans to address adverse effects. In its submission, Foodstuffs sought conditions attached to the designation requiring that:
- Foodstuffs be consulted on measures to mitigate adverse effects on the operation of New World;
  - compensation be payable if the operation of New World is adversely affected by the works; and
  - the sections of the Outline Plan of Works and subsidiary documents relevant to the operation of New World be subject to the approval of Foodstuffs.
10. The proposal has changed substantively since it was notified. On notification it was indicated that both the north-south and east-west traffic movements through the key Albert Street intersections would be retained at all times. After submissions closed, a supplementary traffic report was published proposing full intersection closure to enable the works to occur. In my opinion, this is a substantive change to the CRL project as it relates to the management of the key intersections on Albert Street during construction and has the potential for quite different and significant effects to that proposal which was originally notified.
11. In his evidence, Ian Clark is now recommending that no more than one of the key intersections be closed at a time, with just the east-west traffic movements retained at the other two key intersections.
12. Whereas Foodstuffs did not initially oppose the proposal, the adverse traffic and amenity effects that will now be generated cause a great deal more concern and in my opinion are sufficiently severe to warrant a recommendation that the requirement be withdrawn unless those effects can be avoided (eg: through imposition of a condition that requires retention of those vehicle movements through the intersections as proposed in the notified version of notices of requirement). At the very least, the increased traffic and amenity effects warrant the imposition of conditions that give certainty as to the form and effectiveness of vehicular access to the supermarket for servicing, and pedestrian access for customers.

## ADVERSE EFFECTS ON FOODSTUFFS

13. Section 171 of the RMA requires a territorial authority to consider the effects on the environment of allowing a requirement. This is the primary issue required to be addressed by s171 and other matters are to be had regard to in considering those effects. Despite the degree of support there may be in the various planning documents that are required to be considered for the overall requirement, it is my view that if adverse effects are found to be so significant that they cannot be appropriately remedied or mitigated, the requirement, or part of the requirement, under consideration should not be recommended for approval.
14. In relation to the New World, adverse effects are likely to be generated only during the construction phase the Project.

### *Anticipated Construction Activities*

15. I have reviewed the evidence of Bill Newns and identified the construction activities along Albert Street that will have implications for the ongoing operation of the New World.
16. A cut and cover method of construction is proposed for the tunnels along the northern part of Albert Street and the works will take place within a hoarded area taking up most of the width of the street. Either side of the hoarding will be a service lane (heading south on the eastern side of Albert Street and north on the western side of Albert Street) and a footpath. In relation to the New World, it is intended that vehicles servicing the supermarket will turn left off Albert Street into Mills Lane and exit onto Albert Street via Swanson Street, again with a left turn. I understand that the service lane will not be available for use by general traffic. Only one pedestrian access across Albert Street is proposed between Customs Street and Victoria Street at any time. On the drawings attached to Mr Newns evidence this is shown indicatively adjacent to Swanson Street.
17. Along with the closure of Albert Street, except for limited vehicle access to properties, it is proposed that the intersections of Albert Street with Victoria Street and Wellesley Street will be completely closed to vehicle traffic, each for a period of 11 to 18 months. Except for left turns into Albert Street from Customs Street, the intersection of Albert Street with Customs Street will be closed for up to 9 months. According to the information provided in the statements of Bill Newns and Ian Clark only one of these intersections will be closed at any one time.

18. Bill Newns states in his evidence that the construction of the cut and cover section of tunnels is expected to take approximately 24 months<sup>1</sup> and that this work will take place concurrently with the work to the intersections identified above. Based on the durations given in Mr Newns' evidence at paragraph 194, when the work within the intersections is taken into account the construction of the tunnels along Albert Street between Customs Street and Wellesley Street is likely to take between 33 and 39 months.

*Transport Effects – Servicing of the New World*

19. Foodstuffs' primary concern at the time its submission was lodged was ensuring that New World could continue to be serviced.
20. The provision for a left turn into Albert Street for vehicles travelling west along Customs Street and a service lane with access into Mills Lane and out of Swanson Street appears to have dealt with this issue provided there is no uncertainty in relation to those arrangements and a condition requiring access at all times for service vehicles is maintained. The need for such a condition is also supported from a traffic perspective by John Burgess in his evidence (see paragraph 2.7).
21. This is a matter of such importance to Foodstuffs and other businesses that will rely on the servicing route that it should be addressed and required by way a condition. There is no reason to leave this matter to the subsequent Outline Plan of Works process or the Construction Management Plan stage.

*Transport Effects – Pedestrian Access to the New World*

22. In the notified version of the CRL proposal there did not appear to be any provision made for pedestrian access across the section of Albert Street between Customs Street and Victoria Street. This was of great concern to Foodstuffs because it would mean that the proportion of their customers located to the west of Albert Street would not have ready access to the supermarket.
23. The indication on the drawings accompanying Bill Newns' evidence that provision could be made for an access for pedestrian across Albert Street in the vicinity of Swanson Street allays that concern to a limited extent. However, Foodstuffs is concerned that there is no certainty that pedestrian access will be provided in that location and also that this still leaves a significant length of Albert Street with no link between its western and eastern sides.
24. This matter too should be addressed by way of a condition that explicitly requires the provision of safe and convenient pedestrian access across Albert Street throughout the duration of the project in the immediate vicinity of the intersections

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<sup>1</sup> Evidence of Bill Newns, paragraph 78

of Swanson Street (as a minimum) and Wyndham Street (preferably) with Albert Street.

*Traffic Effects – General*

25. More generally, Foodstuffs is very concerned about the significant effects on the road network in the central city area that are likely to result from the proposed cut and cover methodology for the Albert Section of the CRL when combined with the revised proposal to close each of the major intersections to all vehicle traffic.
26. The application documents assumed that key intersections along Albert Street would be partially closed during the construction of the tunnel but that four-way traffic movements would be maintained. The assessment of traffic effects in the ITA was based on this assumption. Subsequently, significant construction advantages were identified from the closure of each of these intersections completely for a period of between 6 and 18 months. However, the supplementary traffic assessment provided as a result of this amended proposal (after submissions had closed) indicates that full closure of these intersections will lead to greatly increased congestion on the road network in the City Centre.
27. In my opinion the increase in traffic congestion arising from full intersection closure will make it extremely difficult to travel by motor vehicle within the City Centre and will discourage many people from frequenting the City Centre for the duration of the works. I understand that Auckland Transport considers the benefits of full intersection closure in terms of construction time, cost and risk will outweigh those significant adverse effects.
28. The congestion will adversely affect the efficiency of traffic movements, including those of the vehicles servicing New World, and a reduction in visitors, and potentially office workers, to the City Centre over a long period of time will have significant adverse effects on the viability and amenity of many of the businesses in the City Centre.
29. It is acknowledged in Ian Clark's evidence there is "the potential for significant traffic and transport effects due to the construction of the CRL"<sup>2</sup>. In relation to construction affecting key transport movements at the Wellesley Street, Victoria Street and Customs Street intersections, Fiona Blight states "the effect of construction on these movements may include disruption and diversion to normal travel patterns, congestion and travel delays for people travelling to and from the City Centre or through it"<sup>3</sup> (emphasis added). It is my view that, given the choice of

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<sup>2</sup> Evidence of Ian Clark, paragraph 169(b)

<sup>3</sup> Evidence of Fiona Blight, paragraph 83

construction methodology, those significant effects are not potential or possible, they are inevitable.

30. Ian Clark states at paragraph 12(f) of his evidence that “there is no traffic related reason why the Notices of Requirement cannot be confirmed”. I strongly disagree. I consider that the traffic and transport effects of the proposed construction method for the Albert Street section of the tunnel are potentially so significant in terms of congestion, amenity and consequential economic viability of businesses that the panel should recommend either the withdrawal of Notice of Requirement 1, or the imposition of conditions requiring the use of tunnelling technology along Albert Street and the maintenance of four way traffic flows at the key intersections of Albert Street with Customs Street, Victoria Street and Wellesley Street. I address later in this statement the rationale given by Auckland Transport for not using the TBM in Albert Street.
31. In my opinion, the transportation assessment in the AEE has given insufficient consideration to the social and economic effects on the city centre over a construction period of up to 3 years (for this section of the works). The impact will be felt by many businesses within the centre and I consider that these effects are unacceptable.

#### *Vibration Effects*

32. It appears from the information in the AEE and in the evidence of James Whitlock that there is unlikely to be any damage to the building at 125 Queen Street as a result of vibration from the proposed construction activities on Albert Street. However, Foodstuffs is concerned that vibration from construction activities may damage fixtures and fittings and cause stock to fall off shelves. This would be a direct economic cost for the owner of New World and I consider that compensation should be payable if that were to occur.

#### *Concluding Comments on Effects*

33. Based on the AEE and the evidence I have reviewed, my conclusion in relation to potential adverse effects on New World is that most direct effects – specifically servicing arrangements, pedestrian access and stock damage from vibration - can be satisfactorily mitigated by imposing appropriate conditions on the designation (if recommended for approval). However, in relation to the significant effects on the operation of the road network in the city centre that are likely to arise from the proposed construction methodology for the Albert Street section of the CRL, I do not consider that mitigation is possible unless the methodology is changed.

34. Fiona Blight suggests in her evidence in relation to adverse effects resulting from the proposed construction works on Albert Street that “the implementation of the recommended performance criteria, along with other mitigation proposed in the NoR conditions, ... will reduce these effects to ones that would be anticipated by construction works of this large scale occurring in this location”<sup>4</sup>. She seems to be saying here that significant adverse effects are acceptable if they are anticipated because of the scale of the project or its location. My view is that significant adverse effects from construction should be mitigated to the greatest extent possible, taking into consideration alternative methods of carrying out the works, regardless of the nature of the project.
35. In light of these significant effects, it is my opinion that either the methodology for the construction of the tunnels along Albert Street should be changed to a bored tunnel, or the panel should recommend the withdrawal of Notice of Requirement 1 which covers this part of the works.

## **STATUTORY ASSESSEMENT**

### **Policies and Plans**

36. I have reviewed the statutory and non-statutory plans and documents that include objectives and policies that are relevant to the consideration of the effects of the proposed designation and I note that those matters supportive of the Project have been recognised in the AEE and in the evidence of Bryce Julian. However, the objectives and policies in the Auckland Regional Policy Statement and in the Auckland Council District Plan include requirements to avoid, remedy or mitigate adverse effects on the environment.
37. These include the following sections:
- Regional Policy Statement - Strategic Policies 2.6.14.1(iii) and 2.6.14.5(i)(c); Objective 4.3.2 and Policy 4.4.1.2.
  - Auckland Council District Plan (Isthmus Section) – Objectives 8.6.10.1(b) and 12.3.1 (6<sup>th</sup> bullet).
38. Consideration of these objectives and policies does not, in my opinion, alter the overall impression that there is a high level of support for the project to be found in the statutory plans and documents. However, the lack of acknowledgment of those objectives and policies referring to adverse effects indicates to me that, in applying a holistic approach to assessment, the significant effects of the proposal on the City

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<sup>4</sup> Evidence of Fiona Blight, paragraph 85

Centre in relation to the operation of the road network have not been given adequate consideration with this aspect of Auckland Transport's assessment of the proposal.

### **Alternatives and Necessity**

39. It is clear from the application and the evidence prepared by its witnesses that Auckland Transport has considered a number of alternative routes for the CRL and alternative methods of construction.
40. In relation to the construction of the tunnel along Albert Street the alternatives considered were tunnelling and cut and cover construction. The selected methodology is cut and cover and the adverse effects of the construction of this section of the CRL have been assessed in the AEE. According to Mr Newns, the selection of this construction method has been "heavily influenced by the presence of an old stormwater line within the rail envelope"<sup>5</sup>. I understand this to mean that the TBM could be damaged by boring into the pipe.
41. Additional reasons relate to inferior track geometry (if the stormwater pipe is to be avoided) and the need for a worksite in Albert Street if the Downtown site is unavailable. In relation to track geometry, it seems to me that coping with a less than perfect outcome might be a reasonable price to pay for minimising inconvenience for the public. Of course, removing or relocating the stormwater pipe will eliminate this constraint. I understand that the availability of the Downtown site has recently been confirmed.
42. It is unclear, however, whether cut and cover construction will have any advantages in terms of construction cost and risk over the tunnelling option.<sup>6</sup> What is clear is that this methodology will have significant adverse effects over a long period of time on the ability of the owners and occupiers of properties along Albert Street, and on side roads, to access their properties and enjoy a reasonable level of amenity. The closure of Albert Street will also contribute to significant traffic congestion in the City Centre arising from the construction works.
43. From my reading of the various reports and evidence on traffic matters, it seems to me that the degree of congestion in the City Centre is likely to be akin to that occurring on an occasional basis when a major arterial is closed due to an accident. I'm not sure I have ever encountered an engineering project with such

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<sup>5</sup> Evidence of Bill Newns, paragraph 64

<sup>6</sup> In relation to the use of a TDM along Albert Street and alternative tunnel alignments to facilitate this, Bill Newns states in paragraph 217 of his evidence:  
"It is far from clear at this time that such alternatives offer significant or indeed any advantages in terms of construction costs and risks."

severe effects over such a long period of time in Auckland. Allowing this level of congestion to occur over a period of years is, in my opinion, unacceptable.

44. The benefits in relation to the avoidance of adverse effects of utilising a TBM over “construction from the surface down” for the Project in general is acknowledged in several sections of Fiona Blight’s evidence.<sup>7</sup>
45. It seems to me that, if the location of the stormwater pipe is a key factor governing the choice of construction methodology, relocating it as one of the enabling works for the project would remove this constraint on the alternative tunnelling methodology. Such works to utilities take place frequently in the City Centre and the Council seems to be able to carry them out with only limited and localised adverse effects on the operation of the road network
46. That the proposed complete closure of key Albert Street intersections is not necessary is evidenced by the allowance for four-way traffic movements in the Notice of Requirement as notified.
47. The better alternatives in relation to adverse effects have not been selected for reasons of time and cost and, in my opinion, Auckland Transport has not given adequate consideration to these alternatives. It appears to me that Auckland Transport has failed to give any or adequate weight to the scale and duration of the adverse traffic effects that its preferred option will generate in comparison with other options.
48. In relation to s171(1)(c), I am satisfied that a designation is the appropriate mechanism for facilitating the project. However, for the Albert Street section of the works to which Notice of Requirement 1 applies, it is clear that the construction methodology chosen – cut and cover construction and complete closure of key intersections - is not necessary and that the alternatives would be much more acceptable in terms of effects.

## **POSSIBLE FORMS OF MITIGATION OF POTENTIAL ADVERSE EFFECTS**

### *Management Plans*

49. Auckland Transport proposes to utilise an Environmental Management Framework (“EMF”) for the Project in order to manage the effects of construction and of the on-going operation of the CRL. This is to be submitted as part of an Outline Plan required for work to be carried out under a designation.
50. The EMF is described in Appendix 1 to the Notices of Requirement for the CRL as “an overarching framework within which mechanisms are developed to mitigate

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<sup>7</sup> Evidence of Fiona Blight, paragraphs 23 and 71

actual and potential adverse effects from the construction, operation and maintenance of the CRL” in order to “ensure that any adverse effects from the construction, operation and maintenance of the CRL are avoided, remedied and/or mitigated throughout the project lifecycle”.

51. In his evidence on behalf of Auckland Transport, Bryce Julian states that the EMF will also provide for “communications with landowners and affected parties to facilitate the management of effects” and that the process provides the “mechanism to review the detail of the works that are proposed, to check compliance with conditions and to request any changes before construction is commenced”<sup>8</sup>.
52. Mr Julian describes the use of management plan frameworks as “a system often employed for managing the effects of large projects where the nature and extent of those effects and/or methods proposed to avoid, remedy or mitigate them is uncertain or could be variable”<sup>9</sup>. He goes on to state that such frameworks are commonly used as a tool for managing effects, that they are “recognised as appropriate and generally reflect good practice”, and that they are particularly useful and practicable when the construction of a project is some time in the future<sup>10</sup>.
53. I agree that management plans are commonly utilised as a technique with approvals under the RMA because, at the time an application is made, the details of construction methodology have very often not been determined. My experience with projects utilising this technique is confined to resource consents where the management plans are subject to Council approval and the effects the management plans relate to are of a general nature and not specific to a particular affected party. In my experience, adverse effects on an individual affected party would typically be dealt with by way of specific condition rather than by a management plan to be approved in the future without the involvement of an affected party.
54. While the proposed EMF provides a large degree of flexibility for Auckland Transport and its contractor, it provides little certainty for those affected by the CRL project. This is a very large and important project for Auckland and I expect there will be immense pressure for the Project to be delivered on time and within budget. With the applicant and the consent authority being related parties in this case I do not consider an EMF will provide sufficient protection for a third party that might be significantly affected by an aspect of the Project. In my opinion, the mitigation of

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<sup>8</sup> Evidence of Bryce Julian, paragraph 18

<sup>9</sup> Ibid, paragraph 117

<sup>10</sup> Ibid, paragraph 118

effects on individuals should therefore be the subject of specific conditions and not left to a later date when there is no recourse.

55. Accordingly, I have recommended a number of matters to be addressed in conditions that will address the concerns of Foodstuffs in relation to the operation of New World and effects on the City Centre as a whole.

#### *Conditions*

56. In his evidence, Bryce Julian states that the conditions applying to a designation for the CRL will create an “effects envelope” and the plans prepared under the EMF for an Outline Plan will demonstrate compliance of the project with the effects envelope. He notes that the Outline Plan process is “not a duplicate consenting process” but is akin to “demonstrating compliance with District Plan rules”<sup>11</sup>.
57. Most of the proposed conditions provide flexibility for AT and its contractor with only a requirement for consultation with affected parties. Those parties have no recourse under the RMA in the event that their concerns are not addressed. I consider it vital, therefore, that conditions are imposed to specifically address the concerns of Foodstuffs.
58. To that end, if the panel recommends the approval of Notice of Requirement 1, it is my view that conditions be amended (or drafted) to address the following matters:
- (i) A left-turn access shall be maintained at all times from Customs Street to Albert Street for vehicles to access or service properties along Albert Street, or its side roads, between Customs Street and Victoria Street. (Slightly stronger requirement than that in the second bullet of proposed Condition 17(a) in Appendix 2 to Ms Blight’s evidence.)
  - (ii) Mills Lane and Swanson Street shall remain open at all times to service vehicles with no temporary closures permitted. (Proposed Condition 17(c) provides for temporary closures and does not specifically mention Mills Lane and Swanson Street.)
  - (iii) In the event that Auckland Transport does not comply with conditions (i) and (ii), Auckland Transport is to make alternative arrangements for servicing the New World supermarket at 125 Queen Street to the satisfaction of Foodstuffs.
  - (iv) Auckland Transport shall carry out pre and post construction assessments of the New World located in the basement of 125 Queen Street to survey and identify damage that might arise as a result of vibration due to the construction of the CRL.

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<sup>11</sup> Evidence of Bryce Julian, paragraph 121

- (v) Auckland Transport shall pay compensation for pay compensation for any damage to stock, fixtures or fittings due to vibration effects, and any loss of business if deliveries to the store are interrupted, as a result of the construction of the CRL.
- (vi) If a construction area is created along Albert Street, direct pedestrian pathways shall be provided at all times across Albert Street at or adjacent to the intersections of Albert Street with Swanson Street and Wyndham Street that are well lit and are designed at an appropriate width and using appropriate materials to ensure the access is convenient and attractive to pedestrians. (Proposed Condition 17(e) provides for passageways across the works “where practicable” only one such crossing between Victoria Street and Customs Street, and no specific requirement for a crossing at Swanson Street.)
- (vii) Both north-south and east-west vehicle movement shall be provided for at all times at a minimum of at least two of the intersections of Albert Street with Customs Street, Victoria Street and Wellesley Street at all times. (Proposed Condition 17(a) only provides for the east-west/west-east connections to be maintained.)
- (viii) The construction of the CRL along Albert Street shall be carried utilising tunnelling rather than cut and cover methodology to the extent that this is practicable.

## **CONCLUSIONS**

- 59. Direct potential adverse effects on New World from the construction of the CRL include interruption to the servicing arrangements for the supermarket, a lack of access to enable New World customers to cross Albert Street during construction, and vibration. Each of these effects can be appropriately mitigated by applying specific conditions to the designation if granted.
- 60. In my opinion, inadequate consideration has been given to alternative construction methodology for the Albert Street section of the CRL. Those alternatives include utilising tunnelling rather than cut and cover construction, and ensuring that four-way traffic movements are maintained at the intersections of Albert Street with Wellesley Street, Victoria Street and Customs Street.
- 61. These proposals for cut and cover construction and limited access through those key intersections will generate significant adverse effects on the efficiency of the City Centre road network with the likelihood that unacceptable levels of traffic congestion will result.

62. As a consequence, I am of the view that Notice of Requirement 1 (which encompasses those Albert Street works) should be withdrawn or, in the alternative, conditions requiring the use of tunnelling along Albert Street to the extent practicable and the retention of four-way traffic movements at the three key Albert Street intersections should be imposed.

**Vaughan Smith**

**26 July 2013**