

IN THE MATTER of the Resource Management
Act 1991

AND

IN THE MATTER Notices of Requirement to
enable the construction,
operation and maintenance of
the City Rail Link

EVIDENCE OF ANATOLE MICHAEL SERGEJEW

**ON BEHALF OF MEDIWORKS NZ LIMITED (IN RECEIVERSHIP) AND TVWORKS
LIMITED (IN RECEIVERSHIP)**

INTRODUCTION

1. My name is Anatole Michael Sergejew. I am a transport planner with over 30 years of experience, with all but 3 of those years in Auckland. My work experience includes eight years of traffic and road safety engineering for the Ministry of Transport. For five years I was an Associate and Senior Traffic Planner with Beca Carter Hollings & Ferner Ltd, Consulting Engineers in Auckland, and for most of that time I was responsible for traffic planning work undertaken by the company. For six years I worked as Senior Transport Planner at the Auckland Regional Council. For the past four years I have been a Senior Associate for Traffic Planning Consultants Ltd.
2. I have a Master of Engineering Degree in Transportation from the University of Toronto, a Master of Public Policy Degree with Honours from Massey University and am a member of the New Zealand Chartered Institute of Logistics and Transport.
3. My experience includes assessing and reporting on the transport effects of commercial and residential developments and subdivisions, preparing expert

evidence, attendance at Council and Environment Court hearings and providing traffic planning advice to a Council or Planning Commissioner considering development applications. I had six years transport modelling experience at the Auckland Regional Council, and currently lecture on transport modelling at Unitec. For the past three years I have been assisting the New Zealand Transport Agency in monitoring the impacts of the Roads of National Significance projects, including the Victoria Park Tunnel and Waterview Connection.

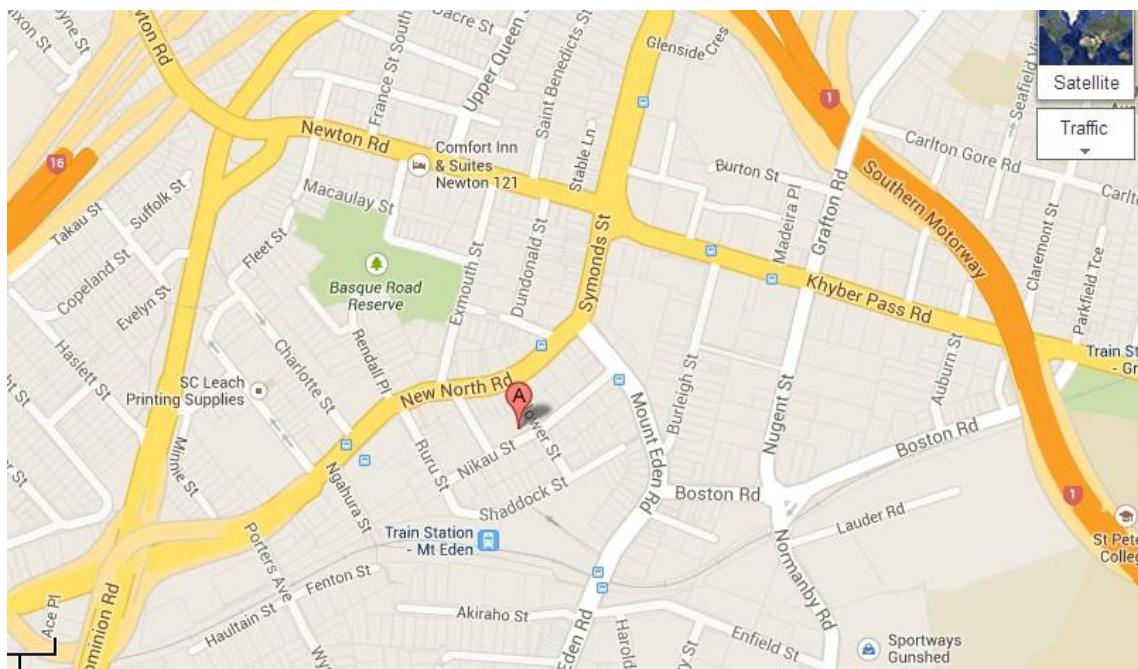
4. MediaWorks NZ Limited (in receivership) and TVWorks Limited (in receivership) (collectively “MediaWorks”) have engaged me to review the transport impacts of the construction of the City Rail Link (CRL), focusing in particular on the operation of their broadcast studios at 3 Flower Street in Eden Terrace.
5. I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court Practice Note and that I agree to comply with it. I confirm that I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express and that this evidence is within my sphere of expertise except where I state that I am relying on what I have been told by another person.

SCOPE OF EVIDENCE

6. My evidence addresses the following:
 - An outline of the current access arrangements for the MediaWorks site in Eden Terrace;
 - An analysis of the expected transport impacts of construction of the City Rail Link on those access arrangements; and
 - A review of the proposed mitigation conditions relating to the above, and suggestions for improvement.

CURRENT ACCESS ARRANGEMENTS FOR THE MEDIWORKS SITE

7. The MediaWorks operations are centred at 3 Flower Street in Eden Terrace, north of the Mt Eden Rail station. The site is bounded by New North Road to the north, Korari Street to the west and Nikau Street to the south. The map below shows the MediaWorks site in relation to the adjacent road network.



As discussed in the evidence of Peter Crossan, the business relies on its central location and ease of access to major arterial routes and local transport system for the timely deployment of news crews and their specialised recording equipment.

8. The MediaWorks site is well situated for this imperative. Access between the site and the Southern Motorway can be via Khyber Pass Road and Symonds Street, or alternatively via Boston Road, Mt Eden Road and Nikau Street. Access to the North Western Motorway is via New North Road, taking either Symonds Street or one of the more minor roads to access Newton Road. Access to the CBD and north is via New North Road or Mt Eden Road to Symonds Street, and access to areas south of Eden Terrace is via New North Road or Mt Eden Road.

9. New North Road is classified as a Regional Arterial Road in the Isthmus Section of the Auckland Council District Plan, while Mt Eden Road is classified as a District Arterial Road. Both roads are heavily trafficked and subject to congestion at peak times. According to the District Plan such roads primarily cater for traffic movement between the major areas of the City, and are essential to sustain overall travel within the City.
10. As right turns on and off Mt. Eden Road are prohibited at the Nikau Street intersection, access to and from New North Road is critical for the site. Due to the level of traffic on New North Road, right turns in and out of Flower Street can be difficult. Fortunately there are traffic signals on New North Road at Korari Street that assist vehicles turning right on and off New North Road to access the MediaWorks site.
11. The figure below gives an overview of the buildings and access points of the MediaWorks operations in Eden Terrace.



12. The main MediaWorks operations are conducted from buildings west of Flower Street, with public access off Flower Street [3]. This accessway leads to 8 visitor parking spaces and 35 staff parking spaces. There is a minor exit from the main car park onto New North Rd [5]. The kerb crossing for this exit is offset from the

driveway, making use difficult. I have been advised that this parking area is used 24 hours a day 7 days a week.

13. The main staff parking building is located east of Flower Street. Access to the upper parking level with 33 parking spaces is via a ramp off Nikau Street [1], while access to the ground floor parking level with 40 parking spaces is off Flower Street [2]. At 22-24 New North Rd there is a staff parking garage for 7 cars and 10 motorbikes/scooters with access off Flower Street [4]. I have been advised that access to these staff parking areas is required from 3am to midnight.
14. Two staff and a tenant car park for activities at 52 New North Rd are accessed off Korari Street [6]. 4 staff and 2 tenant parking spaces for 44 New North Rd are also accessed off Korari Street [7].
15. Access to the loading bay is via two garage doors is off Korari Street [8]. The loading bay gives access to the building and back of studios, and a Transit van used for coverage of special news events is parked in this area. I have been advised that access to the loading bay is required 24 hours a day 7 days a week.
16. Access to a secure internal garage on Level 3 of the main building is off Nikau Street [9]. 22 staff/company cars park in this garage on a daily basis, including 10 news camera crew vehicles, three “Campbell Live” crew vehicles, two “3rd Degree” crew vehicles and certain members of staff for security reasons. I am advised that large amounts of expensive camera equipment are stored in locked rooms in this location as well as in the crew cars.
17. Assuming each crew vehicle covers a minimum of four stories a day the total traffic generated by crew vehicles would be 120 movements a day, while the traffic generated by the staff vehicles would be approximately 16 additional movements a day.
18. The internal garage is also the location of all main building waste removal, and the main access to the generator and power supply rooms. Waste is removed from this area on Mondays, Wednesdays and Fridays early in the morning.

EXPECTED TRANSPORT IMPACTS OF CITY RAIL LINK CONSTRUCTION

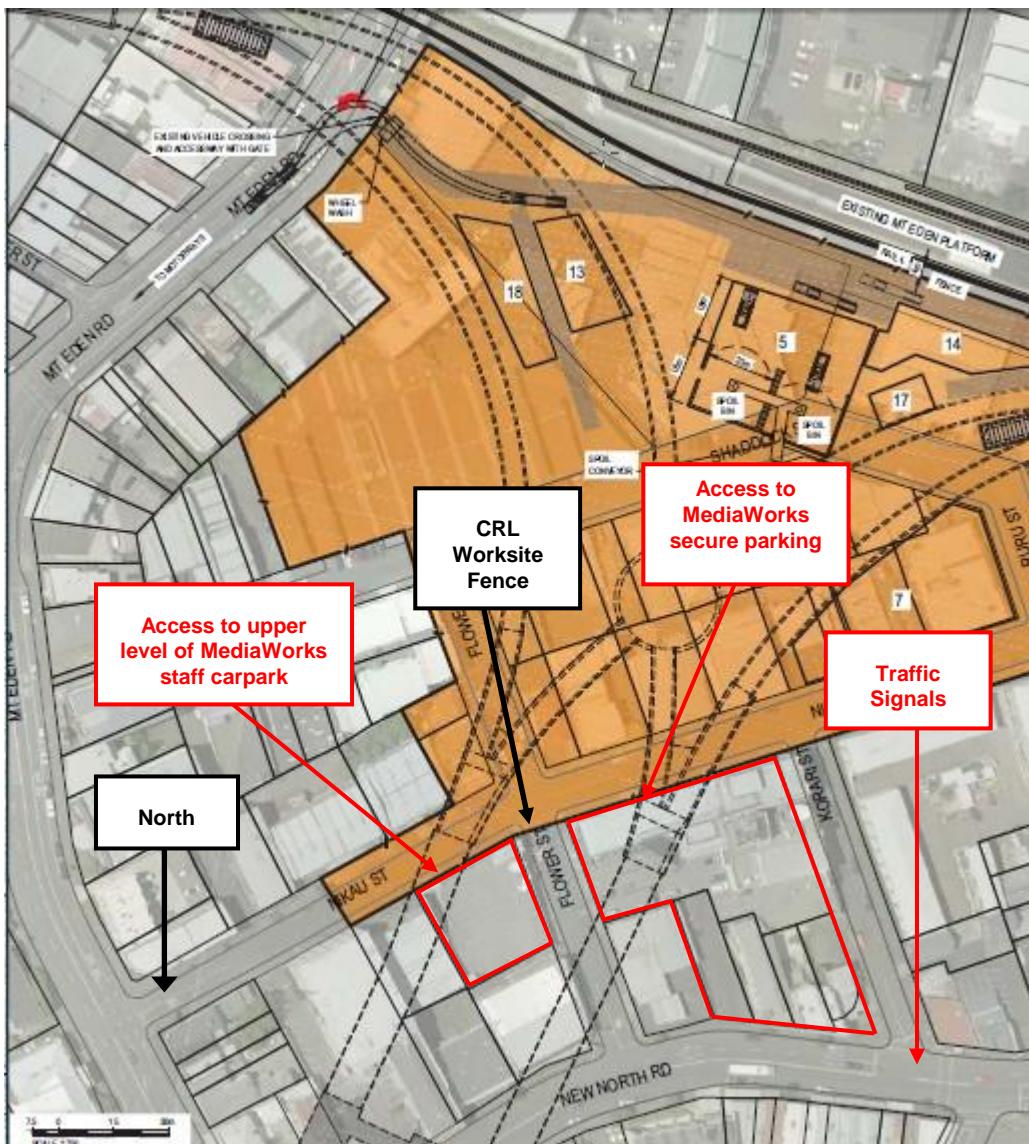
19. The transport impacts of construction of the City Rail link can be considered at three levels as follows:

- a. The impacts of road closures to accommodate the Mt Eden CRL worksite;
- b. The impact of temporary closures adjacent to the MediaWorks site; and
- c. The impacts of construction on congestion on adjacent arterial roads.

I will now discuss each of these three levels of impact in turn.

Impacts of Road Closures to Accommodate the Mt Eden CRL Worksite

20. The plan below is based on a plan of the City Rail Link Mt Eden Worksite attached in Appendix A of the evidence of. William Newns. I have added an outline of the MediaWorks site and noted some key access details.



21. There is to be a fence around the City Rail Link Mt Eden worksite, which I have been advised will be in place for the duration of the CRL construction, i.e. some 5 to 6 years. As is evident from the plan above, the fence will run along the outside of what is currently the footpath on the northern side of Nikau Street, abutting the southern side of the MediaWorks buildings. The Mt Eden worksite fence as proposed will physically sever:
- all access to the secure parking area for news crews;
 - all access to the upper level of the staff carpark;
 - all egress from the fire escape from level 2 of the main building;

- d. access to the on-site generator and Uninterrupted Power Supply;
 - e. direct access between the site and Mt Eden Road; and
 - f. access to the traffic signals on New North Road at Koraris Street for visitor parking and what remains of the staff parking.
22. It is important to note that there is no prospect of alternative access being provided to the secure parking for the news crews or the generator and power supply area. Nor is there any proposal to replace the access to the upper level of the carpark. These changes will therefore inevitably have a significant impact on the current MediaWorks operations. To my knowledge no adequate mitigation measures are proposed to address those effects.
23. The impact on MediaWorks of severing access to their secure parking area, the upper level of their staff carpark, their level 2 fire escape, and their site generator and Uninterrupted Power Supply for 5 to 6 years while the CRL is constructed is described in the evidence submitted by Peter Crossan.
24. The severing of direct access to Mt Eden Road and of the option of driving around the MediaWorks building via Nikau Street to the traffic signals at Korari Street means that all but loading traffic and the few staff that park on Korari Street driving to and from the site will need to access the site off New North Road via Flower Street, with no assistance to make right turns across the heavy traffic flows on New North Road. This would be difficult enough at current traffic levels, but will be compounded by the increased congestion on New North Road that can be expected due to the various wider road network interruptions associated with the CRL construction, and construction traffic travelling to and from the CRL Mt Eden work site, as described later in my evidence.

Impacts of Temporary Closures Adjacent to MediaWorks Site

25. Conditions 19(b), 20(a) and 20(b) of the Draft Proposed CRL Notice of Requirement Conditions included as Attachment 2 to the evidence of Fiona Blight indicate that the construction of the CRL may, amongst other things, require:

- a. temporary road lane reductions and / or closures of New North Road, Korari Street and Flower Street; and
 - b. temporary closure of local vehicle and pedestrian access to properties located outside the designation footprint along Korari Street and Flower Street.
26. Paragraph 149 of the evidence of Ian Clark reveals that temporary closures may be in place for up to 72 hours (3 days) at a time. I have been advised that, given the preliminary stage of the design, it is not yet known how often these roads and properties will be subject to such temporary access restrictions, and that it is proposed that this will not be known until the time of construction.
27. As I noted above, due to the fence around the CRL Mt Eden Worksite, all access to the MediaWorks site will have to be off New North Road via Korari Street for all service vehicles accessing the loading bays, and off New North Road either directly or via Flower Street for all visitor vehicles and the majority of staff. Requiring all staff and visitor vehicles to access the site off New North Road without the assistance of the traffic signals at Korari Street is likely to result in significant increases in congestion and thus delay for vehicles wishing to access the site, particularly in peak periods. Unfortunately at this stage the possible extra delay to these vehicles has not been quantified.
28. The evidence of Peter Crossan describes the impact on MediaWorks of vehicle and pedestrian closures of up to 3 days duration at a time to their site.

Impacts of Construction on Congestion on Adjacent Arterial Roads

29. As discussed in paragraph 8 of my evidence, key access roads to and from the media works site include New North Road, Symonds Street, Newton Road, Khyber Pass and Mt Eden Road. If the CRL construction proceeds as currently envisaged, various elements will combine to increase congestion on these key roads, for example:
- a. 400 heavy vehicles per day accessing the Mt Eden CRL worksite (refer para 183 of the evidence of William Newns) accessing the site from

Newton Road, Khyber Pass, Symonds Street, New North Road and Mt Eden Road (refer figure 20 of the evidence of Ian Clark).

- b. The SATURN model demand flow difference plots included as Appendix B to the City Rail Link Integrated Transport Assessment (August 2012) and those attached as Appendix A to the evidence of Ian Clark appear to indicate that construction vehicle traffic, plus traffic restrictions variously on Albert Street, Victoria Street, Beresford Square, Wellesley Street and Customs Street will result in significant increases in traffic demand on Symonds Street and New North Road.
 - c. The closure of Normanby Road for 6 months (refer paragraph 170 of the evidence of William Newns).
 - d. The closure of Porters Avenue for between 2 and 3 years (refer paragraph 176 of the evidence of William Newns).
 - e. The replacement of the Mt Eden Road rail bridge to accommodate the CRL tracks below (refer to paragraph 94 of the evidence of Fiona Blight).
 - f. Temporary road lane reductions and / or closures on Symonds St and the Symonds Street / Mt Eden Road / New North Road intersection associated with construction of the Newton station (refer Conditions 19(b) of the Draft Proposed CRL Notice of Requirement Conditions included as Attachment 2 to the evidence of Fiona Blight).
- 30.** In the City Rail Link Integrated Transport Assessment dated August 2012 and the CRL Supplementary Report “Traffic Modelling of Alternative Construction Scenarios” dated May 2013, the effects on traffic of the various road closures and restrictions during construction of the CRL have been assessed using a SATURN traffic model of the Auckland CBD. That model can assess the degree to which traffic will be diverted to other routes, and the level of congestion that is likely to result from traffic restrictions and reassignment.
- 31.** Footnote 8 to the evidence of Ian Clark states that “the City Centre SATURN model is a traffic assignment model. It was originally developed by FLOW in

2010 for the former Auckland City Council and it has been subject to peer review.” I have been supplied with a technical note prepared by FLOW describing how the model was subsequently updated and revalidated in May 2012. At that stage the model’s road network was expanded further south to include New North Road, Boston Road and Mt Eden Road.

32. A critical part of transport model development and peer review is validation, which involves checking the model to ensure it replicates the present day traffic volumes and congestion conditions to a reasonable degree of accuracy. Unfortunately it appears that the validation of the model as updated in May 2012 did not consider how well it replicated traffic delays on New North Road or Mt Eden Road.
33. Even the May 2012 model update could not adequately assess the traffic impacts in the vicinity of the MediaWorks site in Eden Terrace, because it did not model Mt Eden Road as far south as Normanby Road. This point is picked up in the “Technical Specialist Report on Transport Matters” prepared for Auckland Council by MWH, which states in section 5 that “the current traffic model does not fully include an extended network of roads to properly assess the effects to the road network at the NAL end of the CRL”.
34. Paragraph 153 of the evidence of Ian Clark acknowledges this and advises that “modifications were made to the model during May/June 2013, to address this issue and this work was based on a number of new traffic counts in the area to properly inform the assessment of the temporary effects”.
35. Unfortunately, the May/June 2013 model update still did not appear to verify how well the model can replicate peak period travel times on New North Road or Mt Eden Road.
36. With this lack of information, I cannot comment on the expected levels of congestion on key access roads in the vicinity of the media works site, particularly New North Road and Mt Eden Road, arising from the CRL construction.

MITIGATION OF CONSTRUCTION TRAFFIC IMPACTS ON MEDIWORKS

37. In discussing the mitigation of transport impacts of construction of the City Rail link, it is again useful to consider them at three levels as follows:
- a. The impacts of road closures to accommodate the Mt Eden CRL Worksite.
 - b. The impact of temporary closures adjacent to the MediaWorks site; and
 - c. The impacts of construction on congestion on adjacent arterial roads.

Mitigating Impacts of Road Closures to Accommodate the Mt Eden CRL Worksite

38. As discussed in paragraphs 21-24 above, the fence around the proposed City Rail Link Mt Eden worksite will sever access to the MediaWorks secure parking area, the upper level of their staff carpark, their level 2 fire escape, and their site generator and Uninterrupted Power Supply, as well as severing direct access to Mt Eden Road and to the traffic signals at Korari Street for all visitor and the majority of staff traffic, for 5 to 6 years while the CRL is constructed.
39. The most obvious mitigation of this effect would be to relocate the northern boundary of the City Rail Link Mt Eden worksite so that the fence is on the southern side of Nikau Street.

Mitigating Impacts of Temporary Closures Adjacent to MediaWorks Site

40. As discussed in paragraphs 25-28 above, it is proposed that construction of the CRL may require road lane reductions and / or closures on New North Road, Korari Street and Flower Street; and closure of local vehicle access to properties along Korari Street and Flower Street for up to 3 days at a time. At this stage there is no indication how many times such closures may occur.

41. Conditions 19(b) of the Draft Proposed CRL Notice of Requirement Conditions suggests that when the closures are in place for 12 to 72 hours, the impacts will be mitigated by:
 - a. communicating and consulting on the closure at least 72 hours in advance, and
 - b. providing alternative parking arrangements as close to the site as practicable.
42. Peter Crossan's evidence explains that this would be unacceptable for Mediaworks because at any time AT could effectively isolate even more of MediaWorks' operations. They request that the conditions that envisage these road closures be deleted in their entirety.

Mitigating Impacts of Construction on Congestion on Adjacent Arterial Roads

43. As discussed in paragraphs 29-36 above, various elements of the CRL construction will combine to increase congestion on key access roads to and from the media works site including New North Road, Symonds Street, Newton Road, Khyber Pass and Mt Eden Road.
44. The proposed mitigation measures include retaining at least one traffic lane in each direction on the Mt Eden Road rail bridge at all times, and ensuring that works associated with the closure of Porters Avenue, Normanby Road and the reduction in the number of vehicle lanes on the Mount Eden Road bridge are undertaken one at a time.
45. Unfortunately no information has been supplied on how realistically the modified model can replicate travel times on New North Road and Mt Eden Road in the morning, midday and evening peak periods.
46. With this lack of information, I cannot comment on the expected levels of congestion on key access roads in the vicinity of the media works site, including New North Road and Mt Eden Road arising from the CRL construction with the proposed mitigation measures in place, and thus whether the mitigation measures proposed are adequate.

47. Section 5.3 of the City Rail Link Integrated Transport Assessment (August 2012) indicates that 23,000 passengers entered the Auckland city centre by bus in the weekday morning peak period in 2011, and that the majority of buses are concentrated on three corridors – Symonds Street northbound (with 283 inbound buses); Albert Street northbound (with 149 inbound buses); and Fanshawe Street eastbound (with 194 inbound buses). Section 6.5 of the Integrated Transport Assessment indicates that Symonds Street is in the top tier of importance of the Auckland City Centre strategic transport routes for all transport modes.
48. Clearly, then, adequately assessing and managing travel time impacts of CRL construction on Symonds Street (and the roads feeding into it, i.e. New North Road, Mt Eden Road and Khyber Pass Road) will be critical not just to MediaWorks, but to all businesses in the Auckland CBD. At this stage, given the lack of information supplied, I have no confidence that the travel time impacts on these critical corridors have been adequately assessed or will be adequately mitigated.
49. In paragraph 22 of her evidence, Fiona Blight suggests that “the adverse environmental effects occurring during construction of the CRL will not be dissimilar to those adverse effects experienced during the construction of other similar sized infrastructure in Auckland” and mentions the State highway 20 Waterview Connection and tunnel currently under construction as an example.
50. This would be a very desirable outcome, although it appears to be a most unlikely outcome under the draft Consent Conditions as proposed. To help increase the likelihood that this is the case, I believe it would be prudent to adopt some conditions of consent for construction of the CRL that currently apply to the construction of the Waterview connection, for example:
- a. restricting construction truck movements during peak hours (6:00 to 9:00 and 16:00 to 19:00) on weekdays and during the peak periods at the weekends;
 - b. maintaining at least the existing active traffic lane configuration capacity on key arterial roads during peak periods being 6:00 to 9:00 and 16:00 to

19:00 on weekdays and during the peak periods on weekends, for the duration of the temporary construction programme;

- c. establishing a Traffic Management Project Governance Group comprising members from each of the key stakeholders to approve site-specific traffic management plans and monitor transport outcomes during construction;
- d. monitoring the impact of construction in terms of traffic speeds and volumes on a daily, weekly and monthly basis on key arterial roads throughout the construction period to confirm the expected traffic effects; and
- e. requiring site-specific traffic management plans to be reviewed and as appropriate amended to the satisfaction of the Traffic Management Project Governance Group, should traffic monitoring indicate that actual traffic volumes or traffic conditions are significantly different from those expected.

CONCLUSIONS

- 51.** The MediaWorks operation relies on its central location and ease of access to major arterial routes and the local transport system for the timely deployment of news crews and their specialised recording equipment.
- 52.** The fence around the proposed City Rail Link Mt Eden worksite will sever access to the MediaWorks secure parking area, the upper level of their staff carpark, their level 2 fire escape, and their site generator and Uninterrupted Power Supply, as well as severing direct access to Mt Eden Road and to the traffic signals at Koraris Street for all visitor and the majority of staff traffic, for 5 to 6 years while the CRL is constructed. The most obvious mitigation of this effect would be to relocate the northern boundary of the City Rail Link Mt Eden worksite so that the fence is on the southern side of Nikau Street. Without such mitigation

the CRL proposal effectively renders critical parts of the MediaWorks site unusable.

53. Construction of the CRL may require road lane reductions and / or closures on New North Road, Korari Street and Flower Street; and closure of local vehicle access to properties along Korari Street and Flower Street for up to 3 days at a time. At this stage there is no indication how many times such closures may occur. This would further restrict MediaWorks operations. Merely consulting on the closure and providing alternative parking arrangements as proposed would be unacceptable for MediaWorks because at any time AT could effectively isolate even more of MediaWorks' operations. The conditions that envisage these road closures should be deleted in their entirety.
54. Various elements of the CRL construction will combine to increase congestion on key access roads to and from the media works site including New North Road, Symonds Street, Newton Road, Khyber Pass and Mt Eden Road. The effects on traffic of the various road closures and restrictions during construction of the CRL have been assessed using a SATURN traffic model of the Auckland CBD. Unfortunately no information has been supplied on how realistically the model can replicate travel times on New North Road and Mt Eden Road in the morning, midday and evening peak periods. With this lack of information, I can not comment on the expected levels of congestion on key access roads in the vicinity of the media works site, including New North Road and Mt Eden Road arising from the CRL construction with the proposed mitigation measures in place, and whether the mitigation measures proposed are adequate.
55. It would be desirable if the adverse effects occurring during construction of the CRL will not be dissimilar to those adverse effects experienced during the construction of other similar sized infrastructure in Auckland such as the State highway 20 Waterview Connection. Unfortunately this appears to be unlikely under the draft Consent Conditions as proposed. To help increase this likelihood, it would be prudent to adopt some conditions of consent for construction of the CRL that currently apply to the construction of the Waterview connection, for example conditions restricting the hours of construction truck movements, maintaining the active number of traffic lanes on key roads in peak periods, monitoring of congestion of key roads during construction, and requiring traffic

management plans to be approved by a Traffic Management Group comprising key stakeholders, and modified to that Group's satisfaction if the monitored effects of the CRL construction are not as expected.

56. In summary, the CRL proposal will generate severe adverse effects on the MediaWorks operation. The proposal does not avoid and does not adequately mitigate those effects, and thus the project is currently incompatible with the MediaWorks operation.

Anatole Sergejew

26 July 2013