

**IN THE ENVIRONMENT COURT OF NEW ZEALAND
WELLINGTON REGISTRY**

**I MUA I TE KŌTI TAIAO O AOTEAROA
TE WHANGANUI-Ā-TARA ROHE**

ENV-2020-WLG-00014

UNDER the Resource Management Act 1991

IN THE MATTER OF a notice of motion under section 87G of the Act
seeking the grant of resource consents to Waka
Kotahi NZ Transport Agency for Te Ahu a Turanga:
Manawatū-Tararua Highway

**STATEMENT OF EVIDENCE OF LONNIE WILLIAM D'WAYNE DALZELL ON
BEHALF OF WAKA KOTAHI NZ TRANSPORT AGENCY**

**OWNER INTERFACE MANAGER FOR TRANSPORT AGENCY ON THE
PROJECT ALLIANCE**

12 June 2020

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TABLE OF CONTENTS

INTRODUCTION	3
BACKGROUND AND ROLE	4
EXECUTIVE SUMMARY	5
THE TRANSPORT AGENCY'S STATUTORY ROLE AND FUNCTIONS.....	5
BACKGROUND TO AND NEED FOR THE PROJECT	7
PROJECT OBJECTIVES AND PROJECT FUNCTION.....	9
THE BENEFITS OF THE PROJECT	10
INTENDED PROGRAMME AND PROCESS TO DATE	13
PARTNERING WITH IWI.....	15
CONSULTATION AND ENGAGEMENT	18
PROPERTY ACQUISITION AND LAND FOR ECOLOGY MEASURES.....	21
COMMENTS ON SUBMISSIONS	23
COMMENTS ON SECTION 87F REPORTS.....	32

INTRODUCTION

1. My full name is **Lonnie William D'Wayne Dalzell**.
2. I work at Waka Kotahi NZ Transport Agency ("**Transport Agency**") and am the Transport Agency's 'Owner Interface Manager' for Te Ahu a Turanga Alliance, the alliance engaged by the Transport Agency to design and deliver Te Ahu a Turanga: Manawatū-Tararua Highway Project ("**Alliance**" and "**Project**" respectively).
3. While I am not giving expert evidence, for completeness I have the following qualifications and experience relevant to my evidence:
 - (a) I hold a Bachelor of Surveying (Credit) from the University of Otago (2003).
 - (b) I have worked as a Project Manager (or similar role) on a number of large projects since 2006, including:
 - (i) this Project;
 - (ii) Ōtaki to North of Levin state highway project;
 - (iii) Transmission Gully state highway project;
 - (iv) Macraes Gold Mine Phase III Expansion; and
 - (v) Waitaki District Council roading maintenance.
4. My evidence is given in support of the application for resource consents for the Project lodged by the Transport Agency with Manawatū-Whanganui Regional Council ("**Horizons**") on 11 March 2020. I confirm that I am authorised to give this evidence on behalf of the Transport Agency.

Purpose and scope of the evidence

5. The purpose of my evidence is to explain the need for and purpose of the Project and to summarise the development of the Project to date, with a particular focus on the engagement carried out by the Transport Agency with landowners, key stakeholders and the general public, and our partnership with tangata whenua.
6. My evidence addresses:
 - (a) the Transport Agency's statutory role and functions;
 - (b) the background to and need for the Project;
 - (c) the Transport Agency's objectives for the Project;

- (d) the benefits the Project will bring to the people and communities of Manawatū, Tararua, and beyond;
- (e) the Transport Agency's intended programme for delivery of the Project, and the goal of opening the new road as quickly as possible, and the Resource Management Act 1991 ("**RMA**") processes being followed to achieve that outcome;
- (f) the Transport Agency's approach to undertaking engagement, the wide-ranging engagement processes undertaken by the Transport Agency, and how those discussions have shaped the boundaries of the designation, the content of the proposed resource consents and the Project more generally;
- (g) the Transport Agency's property acquisition programme for the Project;
- (h) a response to matters raised in submissions, as relevant to my evidence; and
- (i) a response to Horizons' Section 87F Report.

BACKGROUND AND ROLE

7. I am part of a large Transport Agency and Alliance team working to deliver the Project.
8. I was appointed as the Project Manager for the Project in January 2018, and was part of the team which worked to lodge the notices of requirement ("**NoRs**") necessary for the Project. I have also been involved in negotiations with landowners and discussions with numerous other stakeholders, including those parties who appealed the Transport Agency's decision to confirm the NoRs in June 2019.¹
9. During the NoR phase I oversaw the team of designers and technical specialists who considered, investigated and refined the indicative design of the Project at that time.
10. In parallel with the NoR phase I took part in the Transport Agency's process of procuring partner organisations to form the Alliance through which the Project is to be delivered.
11. Since the formation of the Alliance I have worked as the Transport Agency's 'Owner Interface Manager' within the Alliance. The key tasks for the Alliance

¹ As the Court is aware, the appeals against that decision have been resolved by consent on the basis of amended conditions and a shift in the alignment of the Project (the "**Northern Alignment**"). The Environment Court granted the consent order of the parties on 27 March 2020.

include undertaking increasingly detailed design work for the Project, preparing applications for the resource consents necessary to implement the Project under Horizons' One Plan (including the present application), and constructing the Project.

12. Throughout this time, my role has continued to include extensive day-to-day engagement with landowners and other stakeholders.

EXECUTIVE SUMMARY

13. The Transport Agency and Alliance team is working hard to deliver this Project, which will provide significant benefits to both local communities and New Zealand as a whole, and responds to the urgent need for a replacement of the Manawatū Gorge section of State Highway 3 ("**SH3**"). The Transport Agency is determined to deliver the Project as quickly as possible without compromising on quality.
14. The Transport Agency has been privileged to be able to form partnerships with local iwi on the Project. More generally, sharing knowledge, identifying and addressing issues early, and collaboration have been key principles underpinning the Transport Agency's approach to engagement on the Project. The Transport Agency team is continuing to work hard to address issues raised by submitters and others, and to narrow the matters that need to be traversed at the upcoming hearing.
15. Land acquisition for the Project is on a critical path, and my evidence summarises the Public Works Act 1981 ("**PWA**") processes that the Transport Agency is working through with affected landowners. Effects on landowners will be compensated for by the Crown under the PWA regime.
16. I am very grateful to our tangata whenua partners and other organisations and individuals who have been engaging with the Transport Agency and supporting us in this endeavour.

THE TRANSPORT AGENCY'S STATUTORY ROLE AND FUNCTIONS

Introduction

17. The Transport Agency is the statutory body charged with operating the state highway network under the Land Transport Management Act 2003 ("**LTMA**").²

² In line with that responsibility, the Transport Agency is approved as a requiring authority under section 167 of the RMA for the purposes of constructing and operating state highways (as well as cycleways and shared paths).

18. The Transport Agency's statutory objective under the LTMA is to *"undertake its functions in a way that contributes to an effective, efficient, and safe land transport system in the public interest."*³
19. The Transport Agency's statutory functions are defined in section 95(1) of the LTMA. Of relevance to the Project, the functions of the Transport Agency in section 95(1) include:
- "(a) to contribute to an effective, efficient, and safe land transport system in the public interest (...)*
 - (c) to manage the State highway system, including planning, funding, design, supervision, construction, and maintenance and operations, in accordance with this Act and the Government Roading Powers Act 1989 (...)*
 - (e) to manage funding of the land transport system (...)"*
20. In meeting its objective and undertaking these functions, the Transport Agency is required by the LTMA to exhibit a sense of social and environmental responsibility, while using revenue in a way that seeks value for money.⁴

Government Policy Statement and National Land Transport Programme

21. The LTMA requires the Minister of Transport to issue a Government Policy Statement ("**GPS**") every three financial years.⁵ The GPS enables the Minister of Transport to guide the Transport Agency (and the broader land transport sector) on the outcomes, objectives, and short- to medium-term goals that the Government wishes to achieve through the National Land Transport Programme ("**NLTP**") and from the allocation of the National Land Transport Fund ("**NLTF**").⁶
22. The LTMA provides that the Transport Agency must give effect to the GPS when carrying out its planning functions, including preparing a NLTP.⁷ The NLTP must also contribute to the purpose of the LTMA, which is to *"contribute to an effective, efficient, and safe land transport system in the public interest"*.⁸

³ Section 94, LTMA.

⁴ Section 96, LTMA.

⁵ Sections 84 and 86, LTMA.

⁶ Section 84, LTMA.

⁷ In accordance with section 89(1) of the LTMA, the Transport Agency must give effect to the GPS when performing its functions under subpart 1 of Part 2 of the LTMA in respect of land transport planning and funding.

⁸ Section 19B, LTMA.

23. The NLTP sets out the Transport Agency's planned land transport investments, including for New Zealand's state highways, over the next three years. Activities are not eligible for funding from the NLTF unless they are included in the NLTP.
24. The current NLTP, which outlines the Transport Agency's investment programme between 2018 and 2021, gives effect to the GPS by setting out activities proposed for funding over that three-year period. This states:⁹

"The indefinite closure of the Manawatū Gorge and the temporary closure of SH1 after serious storms has shown the need for a resilient land transport system that keeps routes to key destinations and the region's communities open."
25. The NLTP lists the development of the Project as a key priority for the Transport Agency, with an initial amount of \$122m to be invested *"to create a safer and more resilient route across central New Zealand, linking up the east and west with the Manawatū and Wellington"* in the 2018-21 NLTP (with the balance of funding to be earmarked in the 2021-24 NLTP).¹⁰
26. The Transport Agency's prioritisation of the Project reflects its unique nature and role in replacing a well-used and highly-valued connection between regions, as discussed below.

BACKGROUND TO AND NEED FOR THE PROJECT

27. The background to the Project is described in the Assessment of Environmental Effects ("**AAE**") accompanying the application for resource consents, and I summarise key points below.
28. SH3 through the Manawatū Gorge provided a vital connection between the west and east of the North Island, connecting the Manawatū-Whanganui region with Hawke's Bay, and the communities of Woodville and Dannevirke with Ashhurst and Palmerston North.
29. Prior to its closure, the route carried approximately 7,600 vehicles per day and was classified as a National Road.¹¹ It carried freight traffic at a level qualifying it as an important national freight link.

⁹ At page 75.

¹⁰ At page 78.

¹¹ Under the One Network Road Classification ("**ONRC**"). The ONRC is a classification system that divides New Zealand's roads into six categories (from 'national' through to 'access') based on how busy they are, whether they connect to important destinations, or are the only route available.

30. The Manawatū Gorge route had a long history of unplanned closures due to slips blocking the road.¹² Over time, the widening of the road required large cuts into the southern side of the Gorge. These cuts steepened the base of the slope and led to greater instability at various locations throughout the Gorge.
31. The scale and frequency of land instability events increased over time, with each event resulting in substantial road user disruption and requiring significant investment to remediate.
32. Following a significant landslide in April 2017, the Manawatū Gorge section of SH3 was closed. The repair and use of the state highway for vehicular and other traffic is considered unsafe due to ongoing movement and instability risk, including risks associated with seismic activity. This, in combination with the ongoing maintenance liability, resulted in the Transport Agency deciding to close the existing SH3 through the Manawatū Gorge and to investigate construction of a replacement route.
33. The closure of the Gorge has not resulted in any reduction in traffic volumes traversing the Ruahine and Tararua Ranges. As a result, Saddle Road and the Pahiatua Track, which have provided the primary alternatives to the Gorge route since its closure, have been required to absorb all traffic that had previously used the Manawatū Gorge route. There has been a spike in the number of crashes on Saddle Road from Ashhurst to Woodville, and on the Pahiatua Track from Aokautere to Woodville. It is anticipated that over time, there will be more crashes on both alternative routes than there were on the Gorge route previously.
34. The evidence of **David Dunlop** explains the transport problems created by the closure of the Gorge route. In short, the increase in traffic using the Saddle Road and the Pahiatua Track has had significant impacts on nearby residents and the wider region and has led to an increase in crash events on these alternative routes. While improvement works on Saddle Road have been carried out, neither of these steep, narrow and winding routes are able to provide an appropriate level of service for a permanent SH3 connection in terms of safety, resilience and efficiency, at least not without significant realignment and improvement.

¹² Since 1980, seven road closures ranging in duration from two days to 14 months (in 2011- 2012) were recorded.

35. As set out in more detail in the evidence of **Mr Dunlop** and in the AEE, there are fundamental operational issues associated with both Saddle Road and the Pahiatua Track, including:
- (a) relatively poor levels of safety;
 - (b) congestion and travel time unreliability, which affects cars and freight vehicle movements alike;
 - (c) route security issues, in terms of risk of closure from slips and other incidents (and the paucity of other route options);
 - (d) amenity and social effects, in particular for the community of Ashhurst due to significantly increased traffic volumes through the centre of town; and
 - (e) a growing population, leading to all these effects being exacerbated over time.
36. The scale of impacts of the closure of the Manawatū Gorge route has resulted in an urgent need for a replacement route. The Project has been developed in order to ameliorate each of the issues set out above.

PROJECT OBJECTIVES AND PROJECT FUNCTION

37. The Transport Agency's objectives for the Project are to reconnect the currently closed Manawatū Gorge SH3 with:
- (a) a more resilient connection;
 - (b) a more efficient connection than the Saddle Road and Pahiatua Track; and
 - (c) a safer connection than the Saddle Road and Pahiatua Track.
38. Those objectives focus on the urgent task of replacing what has been lost – that is, reconnecting the regions to the west and east via a highway across rural land, and indeed creating a higher-quality connection than was provided by the Manawatū Gorge route before that connection was severed.
39. Otherwise, the Project is intended to perform the same essential transport function as the Gorge route did, as an important connection forming part of SH3, albeit with vastly improved geometric criteria and shoulders to provide for faster and safer travel by all users.
40. The Project also incorporates a separated shared use path ("**SUP**") for use by walkers and cyclists across the Ruahine Range, alongside the new roading alignment. The SUP was included in the Project as a result of

significant community support being expressed for such a facility, through many submissions made on the NoRs. As provided in the designation conditions, the SUP will be constructed before the road is opened.

41. In late 2019 the Transport Agency established a Community Liaison Group (also provided for in the designation conditions), comprising of community representatives and other stakeholders, to consult on the detailed design of the SUP. I have attended some meetings of the Community Liaison Group and have a good sense of the matters discussed in that forum.
42. The Project incorporates a number of other cycling and walking connections or facilities, and I hope that opportunities will be identified to build other recreational paths to connect to the SUP and promote active transport and recreation in the area.

THE BENEFITS OF THE PROJECT

43. The Project will provide significant benefits to people living in, travelling between, and travelling through Manawatū and Tararua, in terms of safety, resilience and efficiency.
44. Accordingly, the Project is a key priority for the Transport Agency (as reflected in the NLTP) and is described in Horizons' Regional Land Transport Plan ("**RLTP**") as follows:

"It is critical for regional economic growth that the focus remains on the development of an alternative to the Manawatū Gorge as the principal east-west link between Manawatū and Hawke's Bay. Completion of a new route must ensure an improvement to the resilience and availability of the route as well as realising opportunities for connectivity to land use development, freight hubs and efficiency, and tourism."

45. The Project will deliver on these outcomes. The benefits of the Project are described further in the evidence of **Mr Dunlop**, and include those set out below:
 - (a) The Project will achieve significant safety improvements for road users through:
 - (i) the reinstatement of a connection between Manawatū and the Tararua District, built to much safer geometric standards than Saddle Road and the Pahiatua Track (and the now-closed Gorge route), including continuous median separation of east- and west-bound traffic. The new road is expected to have a KiwiRAP

safety rating of between 4.1 and 4.5 stars, significantly better than the 2-3 star rating of other routes across the ranges;¹³

- (ii) an enhanced traffic environment on Saddle Road and Pahiatua Track, due to traffic redistributing from those routes to the Project;
 - (iii) creation of the SUP to enable safe travel for cyclists and pedestrians across the Ruahine Range; and
 - (iv) a greatly enhanced transport environment for residents, pedestrians, and cyclists in and around Ashhurst, as the trucks and other traffic move away from the community onto the new highway and in light of additional connectivity for active modes.
- (b) Generally speaking, the Project will increase capacity within the roading network and improve efficiency for general traffic and freight, including public transport and emergency services.
- (c) In particular, the Project will improve efficiency by significantly reducing travel times between:
- (i) Ashhurst and Woodville, by more than 8 minutes for light vehicles, emergency services, buses, and freight, approximately halving the existing travel time (and providing a faster connection than the Gorge route did); and
 - (ii) Aokautere (State Highway 57 South) and State Highway 2 to the north of Woodville – the saving for this trip will be more than 24 minutes, again approximately halving the current travel time (via Pahiatua Track and Mangahao Road).
- (d) The Project will greatly improve the resilience of the transport network in the event of a significant earthquake and/or slip, road accidents, or other disruption, by providing:
- (i) a new route between Manawatū, the Tararua District and Wairarapa, built to modern standards, that is more resilient to incidents and events than the Gorge route (Saddle Road and Pahiatua Track will continue to offer alternative routes); and
 - (ii) a new high-quality bridge crossing of the Manawatū River.

¹³ A rating of 4 stars indicates a low- to medium-risk road; 2 or 3 stars indicate a road with major deficiencies in many or some features (respectively).

- (e) The Project will promote economic development in the Manawatū-Whanganui and Wairarapa regions. The major economic benefits of the Project include:
 - (i) significant improvements in efficiency for freight movements and reduced travel times – current inefficiencies are estimated to be costing more than \$22 million per annum; and
 - (ii) increased economic activity and employment opportunities during the Project's construction period. This factor has become even more important due to the Covid-19 pandemic; the Government has made clear its intentions to promote the construction of large infrastructure such as the Project as part of its economic response to the crisis.

- (f) The Project also provides for and promotes active modes of travel throughout the Region. The Project incorporates a number of facilities and other measures for cyclists and pedestrians, including the following:
 - (i) The SUP will be formed along the length of the new road, starting at the Western/Ashhurst Roundabout and terminating at Hampson Street in Woodville. The SUP will be 3m wide along the majority of the route (narrowing to 2.5m for short distances where there are environmental and property constraints), and will have a minimum clearance distance of 0.2m on either side. As described above, the SUP feature emerged in response to feedback received during the NoR hearing.
 - (ii) A series of walkways and boardwalks will be created within a proposed "Wetland Experience Area", which can be accessed from the SUP or a new walking and cycling track from Saddle Road.
 - (iii) A walking track connecting the proposed Wetland Experience Area and Saddle Road will be formed, which will create a recreational loop that is expected to be popular for residents of Ashhurst and other locals and visitors.
 - (iv) A clip-on device will be added to the Ashhurst Bridge to provide separated pedestrian and cyclist access, prior to completion of the Project.

- (v) The Transport Agency is establishing a 'recreational paths fund' of \$1 million for the purposes of constructing recreational paths that could provide additional connections to the SUP.
- (g) The Project has a high degree of alignment with key strategic planning instruments, including the GPS and the RLTP.

INTENDED PROGRAMME AND PROCESS TO DATE

Urgency and two-step process

- 46. The Project has been developed in order to ameliorate the issues and unlock the benefits described above. The Transport Agency's objectives for the Project focus on the urgent task of replacing what has been lost by reconnecting the regions to the west and east, and indeed creating a higher-quality connection – in terms of resilience, efficiency, and safety – than was provided by the Gorge route before that connection was severed.
- 47. The Project is a top priority for the Transport Agency and is a major undertaking, with an estimated cost of \$620M.
- 48. It is also being progressed as a matter of urgency. Given the importance of the Project for the people living in the affected communities, and for the proper functioning of the transport network, the Transport Agency has set itself an ambitious programme within which to deliver the Project, and is working hard to achieve those timeframes while maintaining a robust process. The current programme provides for enabling works to commence this coming summer to allow the main construction works for the Project to commence in January 2021, and for construction of the road to be completed in the 2024/2025 summer.
- 49. In order for the current programme to be achieved, the Transport Agency has been undertaking three tasks – consenting, procurement and land acquisition – in parallel. In a less time-pressured situation these tasks would have been done more sequentially.
- 50. Pursuant to its ambitious programme, the Transport Agency split the designation and regional consenting processes. Part of the rationale for this was to secure designations that allow a more detailed design to be promptly developed and authorised through the regional resource consent and outline plan processes. The sequence followed for the Project is an important part of allowing us to achieve an 18-month programme for the pre-construction phase, instead of 3-4 years.

51. The two-step process of first designating land and then seeking resource consents has also provided the local community and public generally with certainty about the nature and location of the Project. In the case of this Project, it has allowed for strong community and stakeholder input into the design of the Project, notably at critical interface points such as the car parks and entrance to the Manawatū Gorge Scenic Reserve and the SUP to be provided alongside the new road. Importantly, it has allowed the Transport Agency to engage formally with affected landowners at an early stage, and has brought forward discussions regarding land acquisition (which can take some time to conclude).
52. The urgent need for the Project is also the reason the Transport Agency decided to seek that the application for resource consents be referred directly to the Environment Court, rather than be determined in by Horizons in the first instance (and then possibly appealed).

Designating land for the Project

53. Following a council-level hearing and several Environment Court appeals, the designations for the Project are now in effect. The NoR process proceeded as follows:
 - (a) The Transport Agency lodged three NoRs in November 2018 with the relevant territorial authorities, namely Tararua District Council, Palmerston North City Council and Manawatū District Council. The NoRs were heard by a panel appointed by the territorial authorities in March 2019. The Hearing Panel issued its recommendation that the NoRs be confirmed in May 2019, and in June 2019 the Transport Agency confirmed the NoRs.
 - (b) Three appeals were lodged with the Environment Court against the Transport Agency's decision, including in relation to the ecological effects of the Project by Queen Elizabeth the Second National Trust ("**QEII**") and the Director-General of Conservation ("**DOC**").
 - (c) All of the appeals were able to be settled without any substantive hearing in the Environment Court.¹⁴ The QEII and DOC appeals were able to be settled due to the constructive approach taken by those appellants, which was aided by the Transport Agency's decision to

¹⁴ A one-day hearing to determine whether the Environment Court had jurisdiction to confirm one of the designations incorporating the Northern Alignment was held in February 2020.

modify the designation to provide for the Northern Alignment, which reduced the Project's impacts on areas protected by QEII covenants.

- (d) This modification required further consultation with affected landowners, which ultimately had a positive outcome, and the approval of the Environment Court. The Court issued an order resolving the appeals on 27 March 2020.

Procurement of the Alliance

- 54. In parallel, the Transport Agency procured the Alliance to complete further design work, prepare this application for resource consents and, ultimately (with the Court's approval), construct the Project. The competitive tendering process commenced in late 2018, and on 2 July 2019 the Transport Agency announced that it had selected a consortium made up of Fulton Hogan, HEB Construction Limited, Aurecon Limited, and WSP as its preferred tenderer.
- 55. The Alliance is continuing to complete the further detailed design work for the Project and will prepare outline plans to be submitted to the relevant territorial authorities under section 176A of the RMA in respect of the designations.
- 56. In the Transport Agency's experience, it tends to be more efficient to have the same organisation(s) undertake the detailed design of the Project, obtain the resource consents and lodge the outline plans, and then construct the Project. This is because the contractors responsible for a project's eventual construction will themselves be undertaking the detailed design, ensuring that the design and consenting processes are completed only once.

PARTNERING WITH IWI

- 57. A very significant feature of the Transport Agency's approach to consultation and engagement for the Project has been to partner with iwi in the Region in developing the Project. The Transport Agency and iwi have been 'mahī tahi' (working together) closely since early in the Project's development, and iwi input has been integral in shaping the Project to date. I am grateful to have had a role in leading the Transport Agency's partnership approach with iwi in this respect.¹⁵
- 58. The Transport Agency has been privileged to enjoy a partnership relationship with four iwi groupings who have identified an interest in the Project, namely Rangitāne o Manawatū, Rangitāne o Tamaki Nui-ā-Rua, Ngāti Kahungunu ki

¹⁵ The Transport Agency does not take a position on the status of each iwi that are working to develop the Project.

Tāmaki Nui-ā-Rua, and Ngāti Raukawa ki Te Tonga / Ngāti Kauwhata ("**Iwi Partners**").

59. Partnering with iwi has entailed involving Iwi Partners in the tendering process, in Project decision-making, and in the development of the design of the Project at an earlier stage, and in a more active manner than has been taken in previous projects I have been involved with. The Transport Agency has been very open about the processes and information relating to the Project, and has facilitated many visits to the site.
60. In return, the Iwi Partners have been generous in making their expertise and time available to guide the Transport Agency on those matters of interest to them. I am optimistic that, in adopting this approach, the Transport Agency has been able to make the most of its engagement with iwi and operate in a manner that is respectful of tikanga. I believe that this process has ensured Māori who identify with the area have the ability to express their views, if they wish to do so, through the RMA statutory processes.
61. The Iwi Partners are formal partners of the Alliance. They are represented on the Project Governance Board, have appointed Kaimahi to deal with day-to-day demands of the Project, and have established the Iwi Working Group to provide management-level direction to the Kaimahi and wider Alliance design team and make decisions when required.
62. The Iwi Partners' involvement in the current phase of the Project has included providing cultural monitoring and assistance with geotechnical, ecological and water surveys, undertaking site visits as requested to familiarise themselves with the Project, and creating key project documentation in order to ensure that cultural values are recognised, understood and responded to during the design development.
63. I believe that this approach to engagement has been beneficial to both the Transport Agency and iwi, in that many potential issues with the Project have been able to be addressed at an early stage through design, conditions and mitigation solutions, ahead of the determination of resource management authorisations required for the Project.
64. The strengths of this approach are reflected in the fact that, at both the NoR stage and in respect of the current application for resource consents, the Iwi Partners have chosen to provide their perspectives on the Project under the 'umbrella' of the Transport Agency's evidentiary case, whilst maintaining their own tino rangatiratanga, rather than by making their own separate

submissions on the Project. The Iwi Partners similarly provided Cultural Impact Assessments of the original NoRs and the Northern Alignment modification last year alongside technical assessments provided by Transport Agency witnesses.

65. The Cultural Impact Assessments prepared by the Iwi Partners are provided in Volume VI of the application documents. The Transport Agency is grateful for the level of support which has been expressed for the Project, however acknowledges that each of the Iwi Partners' CIAs record some outstanding issues the respective will need addressed, and measures to be implemented. The Transport Agency will work to reach a resolution with the respective Iwi Partners regarding these issues.
66. Whilst there is certainly further work to be done through the next stages of the Project to ensure that the Project's impacts on cultural values are dealt with appropriately, the Transport Agency is committed to ensuring its Iwi Partners are satisfied and proud of the outcomes we have collectively achieved in delivering the final Project. To that end, our collective discussions and work have been continuing since lodgement of the application for resource consents, and will continue throughout the delivery phase.
67. I am confident that the strong relationship which the Transport Agency and Iwi Partners have built will continue to serve the Project well in its next phases, such that any issues that arise will be respectfully resolved.
68. The Transport Agency has also been working closely with the trustees of the Te Āpiti Ahu Whenua Trust, who are the legal owners (and representatives of the beneficial owners) of Parahaki Island at the western end of the Manawatū Gorge. The new bridge crossing of the Manawatū River is adjacent to the island, and a pier is likely to be located on the rocky beach (alluvial gravel fan) near the easternmost part of the island. The trustees have been invited to participate in the Project to a greater extent than I have experienced previously. This interaction has enabled a mutually beneficial relationship and a better understanding of the history of the area.
69. The trustees have also prepared a Cultural Impact Assessment of the Project which is provided with the application documents, and have made a neutral submission on the Project, which I discuss later in my evidence. The trustees have noted in their Cultural Impact Assessment that a high level of engagement will be required in the next phases of the Project.

70. The Transport Agency shares this view and has been working hard to continue engaging with the trustees, with a key driver being to “uphold the mana of the island”. Discussions are continuing in relation to the bridge design and the construction process, ways to mitigate any adverse effects on Parahaki Island (including through mitigation planting), as well as potential opportunities for the owners to achieve better access to the island, promote education on the history of the island and plan for the island's future.

CONSULTATION AND ENGAGEMENT

71. My role throughout the Project, since January/February 2018 – as both Project Manager and more recently Owner Interface Manager – has included being responsible for the Transport Agency’s programme of consultation with landowners, key stakeholders, and the public generally. As explained above, I have also been responsible, on the Transport Agency’s part, for developing the partnerships with tangata whenua.
72. Genuine, transparent and consistent engagement is always vital to an inclusive approach, and to obtaining important information necessary to develop large-scale infrastructure proposals. It has been particularly important for this Project, because of the urgency and the high level of expectations. In order to move forward rapidly, the Transport Agency has been proactive in communicating with stakeholders, seeking input from the beginning into the design and technical assessment work, developing and testing ideas, and seeking to bring to light, and address, potential issues at an early stage. We have also engaged a team of expert and other advisors who have experience in collaborative processes and a proven track record in working with councils and others to deliver high-quality infrastructure.
73. The engagement processes have required considerable effort from the Transport Agency team, and have relied on iwi, the relevant councils, landowners, and stakeholders themselves dedicating their resources to our engagement processes. The Transport Agency is grateful for the central role that those people and organisations have been prepared to play (and will continue to play) in the development of the Project.
74. Overall, I consider that the work carried out by the Project team in engaging with stakeholders and the wider public translates to high-quality consultation and to a best-practice approach to developing partnerships with iwi.
75. Section 5 of the AEE outlines the consultation and engagement which has been undertaken in respect of the Project to date, and outlines the Transport

Agency's consultation framework and guidelines which have informed the approach taken in this Project.

76. Below I provide a high-level overview of the Transport Agency's approach to engagement and summarise the areas where ongoing work will occur.

Engagement with the broader public

77. Extensive public consultation has been carried out on the Project, from the detailed business case phase beginning in 2017, throughout the development and hearing of the NoRs in 2018-2019, and is continuing through the detailed design and resource consent phase of the Project.
78. A number of public information sessions and workshops have taken place over the life of the Project, the feedback from which has informed the design of the Project and the Transport Agency's approach to progressing the Project.
79. In the current phase of the Project, further public engagement has occurred including through public information sessions (between 13 – 21 August 2019, and March 2020 which was interrupted by the Covid-19 lockdown). Additionally, a significant amount of information is available on the Transport Agency's website for the Project, which is kept up-to-date. The Transport Agency also manages an online newsletter regarding the Project which is circulated to subscribers regularly.
80. The Community Liaison Group (which is comprised of representatives from a broad range of community groups, specified in the designation conditions) was established towards the end of 2019. The purpose of the Community Liaison Group is to provide feedback on behalf of the community on the Project – including in relation to detailed design, key Project milestones, the SUP and other relevant matters. The Community Liaison Group has established bespoke topic based working groups to provide focussed input to the development of the SUP and the Western Car Park designs.
81. I consider that because of the extensive public consultation which took place at the early stages of the Project's development, the public was already well informed of and familiar with the Project when it came to developing the resource consents. As a result, I believe many issues which the public may have been concerned with were able to be explored and addressed during the NoR phase of the Project. This is reflected in the relatively small number of submissions received on the application for resource consents (19) in comparison to over 700 received on the NoRs.

Local authorities and stakeholders

82. The Transport Agency has sought to partner with local government and draw on officers' skills and knowledge in delivering the Project, including Horizons, Tararua District Council, Manawatū District Council and Palmerston North City Council.
83. The 'RMA Planning Officers Group', established in July 2018 to discuss processing of the NoRs, has continued to operate in order to deal with the regional consenting process, enabling works applications and the outline plan process. This group has been reshaped to better fit current and future anticipated workloads and comprises:
 - (a) an Environmental Management Group which meets fortnightly to consider applications, outline plans, management plans and compliance issues, and
 - (b) a Planning Steering Group which meets monthly and provides managerial oversight of the Environmental Management Group.
84. In addition, as outlined in the AEE, regular consultation has occurred with Horizons, including topic-specific workshops, general meetings to discuss progress with the resource consents, and a presentation to the Horizons Environment Committee. The Transport Agency and the Alliance have been forthcoming with information relating to Project design, in particular, copies of draft documents in support of the resource consents were provided to Horizons for comment, and the Transport Agency's technical specialists have been in regular contact with their counterparts at Horizons to ensure potential issues are worked through as early and efficiently as possible.
85. As described in the AEE, a number of key stakeholders have been involved in the development of the Project. The Transport Agency has been particularly interested in seeking feedback on the Project, over a long period, from environmental organisations such as QEII, DOC and the Royal Forest & Bird Protection Society of New Zealand Incorporated ("**Forest & Bird**"), asset owners such as Meridian Energy Limited ("**Meridian**") and Transpower New Zealand Limited ("**Transpower**"), and groups representing economic and transport interests.
86. A number of avenues have been available for these groups to engage with the Transport Agency and Alliance on the Project, including those available to the general public. A number of stakeholders have provided their views on

the Project through the submission process, which I address later in my evidence.

87. Feedback from numerous entities has been helpful in shaping the Project; as noted above, the Northern Alignment was developed in order to address concerns raised by the territorial authorities and the organisations that were involved in the NoR appeals (in particular, QEII, DOC and Forest & Bird).

Landowners

88. As with many large infrastructure proposals, the Transport Agency must obtain a range of interests in private property for the Project. This includes permanent acquisition of property for the construction and operation of the Project, temporary occupation rights for the duration of the construction of the Project, and permanent interests to enable ecological offset and mitigation activities.
89. The Transport Agency has prioritised early engagement with affected landowners, and below I summarise the legal processes being worked through for the Crown to acquire private land interests for the Project.

PROPERTY ACQUISITION AND LAND FOR ECOLOGY MEASURES

90. The Public Works Act 1981 ("**PWA**") sets out the framework through which the Crown may acquire land for public works; all land must be purchased through the PWA. Through the PWA regime, full compensation is paid to landowners for the value of any property acquired (and in relation to various other matters) at market rates. Any agreement between the land owner and the Transport Agency must be approved by Land Information New Zealand.
91. In respect of the land required for the Project, the Crown will purchase and provide compensation for that land in accordance with the PWA.
92. It is the Transport Agency's preference that all property needed for the Project be acquired through mutual agreement with affected landowners (under section 17 of the PWA). To that end, the Transport Agency property acquisition programme commenced in earnest early on. I have been part of the Transport Agency team's efforts to progress this programme in parallel to the applications for RMA authorisations for the Project.
93. For a development of this size, the Project affects relatively few landowners – 12 in all, including 8 private individuals or families, Meridian, AgResearch Limited, Tararua District Council, and the Crown.

94. The Transport Agency acknowledges that the land acquisition process can be difficult for landowners, notwithstanding the full monetary compensation paid under the PWA. Discussions with affected landowners began at an early stage in the Project's life and for some have explored the possibility of the Crown acquiring all of the owners' interests, and others have related to a partial purchase of the area directly required for the Project. In the latter case, the Transport Agency has sought to work with landowners on plans and measures to minimise effects on the ongoing use of that land.
95. The Transport Agency has concluded agreements with a number of landowners, and is continuing to engage with the remaining property owners to negotiate satisfactory agreements. I believe that good progress is being made with these outstanding owners.
96. In addition to the above, in order to carry out much of the ecological restoration work proposed, such as offset and compensation planting, the Transport Agency needs to acquire additional property or rights over property. The sites which are proposed to form part of the Project's ecological restoration package are discussed in **Mr Markham's** and **Ms Quinn's** evidence. Significant progress has been made towards securing the sites necessary to achieve these outcomes. Much of the relevant land is intended (or anticipated) to be acquired by the Crown for the Project. Beyond that land, there is other land which will not be acquired (purchased); agreements to allow the necessary restoration work to be undertaken and protected will be entered into, on a voluntary basis.
97. Notably, discussions with owners of private property that has been identified for stream and wetland restoration are well advanced. In particular, four land owners whose interests (in respect of retiring land and planting with native vegetation) align with those of the Transport Agency¹⁶ have agreed in principle to provide the Transport Agency with the necessary access rights to carry out the required planting, fencing, maintenance and monitoring actions.
98. These planted areas will be subject to legal protection in perpetuity (through registered title instruments). Plans delineating potential areas for retirement, including fence lines, are well advanced and once finalised the next step is to enter formal legal agreements with these land owners. This general framework for securing rights over privately owned ecology offset and compensation sites is one the Transport Agency has progressed on other

¹⁶ The four properties (Ratahiwi Farm, Sproull Farm, Beagley Farm, and Tuapaka Farm), are discussed in detail in **Ms Quinn's** evidence. Plans showing the relevant land are included with **Ms Quinn's** evidence.

recent projects, though timeframes are being accelerated for this Project given the urgency I have explained above.

99. The Transport Agency is also progressing discussions to secure ecological restoration sites on Crown-owned or other public land, including land administered by Palmerston North City Council, DOC and KiwiRail. These discussions are particularly well advanced with Palmerston North City Council (which has provided written confirmation of its support for the proposal) and KiwiRail. We have recently commenced positive discussions with DOC regarding the proposed pest control in the northern block of the Manawatū Gorge Scenic Reserve.

COMMENTS ON SUBMISSIONS

100. As I have discussed above, the Transport Agency and Alliance teams are working hard to deliver this Project in a very open, collaborative manner, and within a constrained timeframe, responding to the clear message from relevant councils and the affected communities that the Project is needed urgently. The Transport Agency is very grateful for the considerable input provided by tangata whenua, landowners, the relevant councils, other stakeholders, and members of the public, which has helped bring the Project to this point.
101. I have met with a wide range of people and organisations with a view to obtaining information to feed into the process, bringing issues to light at an early stage, and addressing them if possible.
102. The Transport Agency sees the submissions on this application for resource consents and the ongoing discussions with submitters as a continuation of those collaborative processes. I am grateful for the time that people have taken to make submissions and the further contribution people may choose to make through their participation in this process. The Transport Agency has carefully considered all of the submissions, is genuinely open to discussing people's concerns with them, and has sought to make contact with all submitters (or their representatives) to work through issues at an early stage.
103. A total of 19 public submissions have been received on the Project, 9 of which are in support of the Project, 9 of which are in opposition, and 1 of which is neutral. Compared to other Transport Agency projects I have been a part of, this is a relatively low number, especially for a Project of this scale. I believe this is largely a result of the extensive consultation the Transport Agency has carried out with the public, landowners and other stakeholders

on the Project, both during the designation process and as the application for resource consents has been developed.

Submissions in support

104. A number of the submissions provide general support for the Project, on the basis that the Project will bring about significant economic, social and transport benefits to the Region. These include the submissions by:
- (a) Palmerston North City Council (submission 4);
 - (b) Manawatū District Council (submission 5);
 - (c) Tararua District Council (submission 14);
 - (d) Business Central (submission 7);
 - (e) Graham Speedy (submission 9);
 - (f) Kenneth Barnett (submission 6); and
 - (g) Carl Westwood (submission 1).
105. Again, I thank those people or entities for the time they have taken to prepare their submissions.
106. Improvements to the connectivity in the region were raised by Business Central, Tararua District Council and Manawatū District Council. This includes, as raised by Kenneth Barnett, better access to important infrastructure such as Palmerston North Hospital. Several submissions also noted the issues caused for residents and drivers as a result of traffic being diverted to residential streets following the Gorge route closure.¹⁷
107. Manawatū District Council, Tararua District Council, Palmerston North City Council and Business Central emphasised the need to progress the Project with urgency, and noted the important role it could play in New Zealand's economic recovery from Covid-19.
108. This reflects my understanding of the majority of the local communities' views of the Project. Throughout the consultation process, the primary sentiment expressed to me by the public was that the Project would have important benefits for the region, and that the Transport Agency should focus on commencing and completing construction as soon as possible.
109. I am also heartened to see that a number of submitters, including the Director-General of Conservation (who has submitted in opposition to the

¹⁷ Refer to submissions by Carl Westwood and Business Central.

Project), refer to the positive working relationship they have developed with the Transport Agency over the course of the Project's development. As noted above, I consider this engagement has resulted in many potential issues being resolved with stakeholders ahead of the lodgement of the application for resource consents, resulting in far fewer submissions being received than would normally be expected.

110. A number of submitters provided more specific submissions in support of the Project. I briefly comment on these individual submissions below.

NZ Automobile Association Manawatū District (submission 17)

111. The NZ Automobile Association Manawatū District strongly supports the Project, citing the significance of the route as a regional link and the considerable safety improvements the Project will offer compared to the previous road as core reasons for its support.
112. I acknowledge that the Association, in particular, expresses its preference that the Project provide for a four-lane road along the entire route (as opposed to an earlier design in which the road reduced to a single-lane in each direction across the top of the Ruahine Range). I can confirm that the Project now incorporates a median-separated carriageway with two lanes in each direction (one lane plus a crawler lane) over the majority of the route (including the top section across the Ruahine Range referred to by the Association), and tapers to a single-lane in each direction for short sections at either end of the route, in the approaches to the Eastern and Western roundabouts, for safety reasons.

Heritage New Zealand Pouhere Taonga (submission 11)

113. Heritage New Zealand Pouhere Taonga ("**HNZPT**") has submitted in support of the Project, while noting that it considers that coordination will be required between the resource consent conditions and any determination made by HNZPT on an application for an archaeological authority. HNZPT has also noted particular conditions it would expect to require on any archaeological authority, and the importance of providing for an Accidental Discovery Protocol, management plan and management plan.
114. **Ms McLeod** responds to the HNZPT's suggested conditions and approach to managing potential effects on historic heritage in her evidence. However, I confirm that the Transport Agency is working to prepare an application for an archaeological authority with HNZPT, and looks forward to continuing to work

with HNZPT to develop an appropriate approach to managing the historic heritage elements of the Project.

Neutral submission – Te Āpiti Ahu Whenua Trust (submission 12)

115. I acknowledge the trustees of the Te Āpiti Ahu Whenua Trust, who are the legal owners of Parahaki Island, Rob Karaitiana (who is the chair of the trustees), and all of the beneficial owners of Parahaki Island. I also acknowledge the mana of Parahaki Island and the rich history and traditions associated with the island.
116. Parahaki Island is at the western end of the Manawatū Gorge, immediately to the west of the new proposed bridge crossing the Manawatū River (BR02). A pier is required to be built on the gravel pan immediately upstream of the island in order to support the new bridge.
117. I have had many productive discussions with Mr Karaitiana and the other trustees of Te Āpiti Ahu Whenua Trust as the Project has developed, and these continue as we work on agreeing measures to address their concerns about the Project. I am grateful that the trustees have made a neutral submission on the Project.
118. The submission also requests that the Project be temporarily placed on hold while the trustees make an application to the Māori Land Court to revisit the property boundaries of the island. Mr Karaitiana and I continue to discuss what support the Transport Agency can offer the trustees in that process, but given the urgency of the Project the Transport Agency does not support delaying this direct referral.
119. I am also grateful for the trustees noting in their submission that they have been engaged in positive and constructive engagement with the Transport Agency in respect of the Project's impacts on Parahaki Island since 2018. I agree that our discussions have been positive. Irrespective of the outcome of any application to the Māori Land Court, the Transport Agency is committed to dealing with the trustees' concerns respectfully and appropriately, and I am confident that these issues can be resolved.

Submissions in opposition

120. As noted above, 9 submissions have been received in opposition (or partial opposition) to the Project. I again acknowledge and thank those submitters for providing feedback in this way.
121. These submissions relate for the most part to ecological issues. The evidence of **Justine Quinn, Josh Markham, Matt Baber, Damien McGahan, and Ainsley McLeod** responds to the submissions relating to the ecological effects of the Project (and associated planning and conditions-related matters).
122. I address the submissions in opposition to the Project below, starting with individual submitters in opposition, and then organisations.

Dr Samuel Hill (submission 2)

123. Dr Hill opposes the Project on ecological and cultural grounds. **Ms Quinn, Dr Baber** and **Mr Markham** address the ecological elements of Dr Hill's submission in their evidence.
124. I wish to address Dr Hill's concerns regarding the cultural effects of the Project. Dr Hill is concerned that the Project will have impacts on wāhi tapu in the area, including on Te Ahu a Turanga peak.
125. As I have described earlier in my evidence, the Transport Agency's approach to iwi engagement for this Project has been to actively involve interested iwi at a very early stage. Through the partnering approach our Iwi Partners are part of the Alliance, this includes Rangitāne o Manawatū, Rangitāne o Tamaki Nui-ā-Rua, Ngāti Raukawa ki te Tonga / Ngāti Kauwhata and Ngāti Kahungunu ki Tāmaki Nui-ā-Rua. From within the Project team and Alliance, the Iwi Partners have been tasked with assessing the Project's cultural impacts throughout the development of the Project.
126. As a result of this partnership approach, the potential cultural impacts are being addressed in a sensitive and respectful manner. It is not my position to discuss these matters, however, I am privileged to be trusted with some of the historic and unique kōrero associated with the Project area.

Lou Klinkhamer (submission 3)

127. Mr Klinkhamer has requested that the Project be redesigned as a 'viaduct through the Gorge'. Mr Klinkhamer believes that constructing a replacement road in the form he suggests, which is modelled off the Karakoram Highway between Pakistan and China, will result in significant costs savings.

128. **Mr Watterson** discusses in his brief of evidence the design aspects Mr Klinkhamer's submission, and explains why his suggested approach is not a viable replacement option. **Mr Watterson** also explains that a viaduct option through the Gorge was considered by the Transport Agency as part of its Detailed Business Case process, and was found to be 'fatally flawed' on cultural and other environmental grounds.
129. I wish to respond Mr Klinkhamer's comments regarding the cost of the Project. Mr Klinkhamer states that the Project will cost \$10 billion, and that the design he has suggested will cost between \$2-3 million. This is incorrect. As noted above, implementation of the Project will cost approximately \$620 million.
130. I note additionally that, contrary to Mr Klinkhamer's submission, the expected economic impacts of Covid-19 increase the importance of the Project for New Zealand, as it will be a significant stimulus for the economy. It is highly unlikely that the Project will be put "on the back burner" in order to save Government funding.

Nick Shoebridge (submission 8)

131. Mr Shoebridge owns a property on Napier Road, near Woodville, and has raised a number of concerns regarding impacts from the Eastern Roundabout on his property. These concerns include the impacts of noise and light pollution from the new road, and flooding from the Eastern Roundabout. I have discussed these issues directly with Mr Shoebridge on a number of occasions, and have recently visited him again to update him on the planned works near his property.
132. Mr Shoebridge's concerns were also raised in a submission he made on the NoRs, which culminated in several designation conditions specifically addressing potential impacts on Mr Shoebridge's property. As **Ms McLeod** explains, the designation conditions will ensure that the effects on Mr Shoebridge raised in his submission are addressed. For example, designation condition 29 requires the Transport Agency to construct an earth bund at Mr Shoebridge's property prior to other construction commencing (as Mr Shoebridge seeks), and designation condition 43 requires the Transport Agency to undertake a post-construction review of the noise levels at the property (and provide additional mitigation if necessary).
133. Mr Shoebridge has made a number of complaints regarding the Transport Agency's approach to consultation, which I address below.

134. Mr Shoebridge states that my colleague Hardus Pieters and I have backtracked on a promise to construct a bund along the boundaries of Mr Shoebridge's property. This is not correct. The designation conditions require that a bund is constructed at Mr Shoebridge's property prior to construction in the vicinity of the property beginning. The Transport Agency is absolutely committed to meeting this condition, as I have explained to Mr Shoebridge.
135. To provide Mr Shoebridge and his mother Ms Cooke with additional certainty I have developed a site plan with them to provide them with the confidence that the work is committed to. This work includes items like additional bunding along the eastern boundary and drainage along the front of their property to resolve pre-existing issues, rather than issues resulting from the Project.
136. Mr Shoebridge also raises issues regarding stormwater runoff and drainage at his property, which are addressed in the evidence of **Dr Jack McConchie** and **Dave Hughes**.
137. I can assure Mr Shoebridge (and Ms Cooke), in response to comments in his submission, that the Transport Agency certainly has had regard to his home, and I have personally been communicating with Mr Shoebridge on a regular basis since the NoR process. I will keep providing information to Mr Shoebridge to clarify any further questions he may have.

John Bent (submission 18)

138. Mr Bent has raised concerns regarding the Project's effects on water quality and stormwater design. These concerns are responded to in the evidence of **Keith Hamill** and **Dave Hughes**.

Transpower New Zealand Limited (submission 10)

139. Transpower's submission relates to the Project's potential impacts on the National Grid in the region. Transpower opposes the Project in part only, noting that it is neutral to the merits of the Project, but is concerned to ensure that the National Grid is not compromised.
140. A number of other witnesses, namely, **Ms McLeod, Mr McGahan, Mr Adams, Mr Watterson** and **Mr Chilton** explain the efforts that have already been made to avoid impacts on the National Grid and methods to address Transpower's remaining concerns in their evidence.
141. The Transport Agency, of course, appreciates the importance of ensuring the National Grid is able operate and be maintained efficiently. I have been

engaged in ongoing consultation with Transpower in order to ensure that the Project does not compromise Transpower's abilities to carry out its functions in respect of the National Grid.

Meridian Energy Limited (submission 13)

142. As noted in its submission, Meridian, the Alliance, and the Transport Agency have been engaged in ongoing discussions since the business case phase of the Project regarding methods to minimise the impact of the Project on Te Āpiti Wind Farm, which is bisected by the Project.
143. The Transport Agency acknowledges Te Āpiti Wind Farm as an important source of electricity for New Zealand and sought early on in the process to avoid effects on the wind farm as much as possible, including through route selection (which was completed in consultation with Meridian). Consultation with Meridian continued through the development of the NoRs and the designation hearing in order to develop appropriate mitigation for impacts on wind farm.
144. Engagement on many matters of detail has continued through the development of the resource consents. Governance-level meetings have been taking place between the Transport Agency and Meridian, and the Project designers and engineers meet with Meridian to discuss the detailed design of the Project on a regular basis.
145. Detailed discussions and information sharing between Meridian, the Transport Agency and the Alliance have occurred to ensure that the proposed re-alignment of Te Āpiti Wind Farm access tracks is consistent with Meridian's operational requirements. These discussions have extended to include wind modelling of the access tracks, the proposed spoil sites and the Project generally to help ensure that the wind farm operation is able to continue, and potential effects on the efficiency of the wind farm are understood and managed.
146. I am aware that Meridian has some outstanding concerns with the Project, including in relation to the risk of increased bird strike (addressed in the evidence of **Dr Baber** and **Ms Quinn**). The Transport Agency will continue to work with Meridian as the detailed design of the Project develops further, and I am confident that all of Meridian's concerns can and will be addressed.
147. Meridian's submission comments on a number of technical aspects of the Project relating to the potential effects of the Project on the Te Āpiti Wind Farm. Those comments are addressed in the evidence of other witnesses.

Queen Elizabeth the Second National Trust (submission 16)

148. QEII has submitted regarding the Project's effects on land subject to QEII covenants, and the aspect of the Project impacting freshwater and indigenous vegetation and habitat. The parts of QEII's submission relating to the ecological effects of the Project are addressed in the evidence of **Ms Quinn, Dr Baber and Mr Markham**.
149. The Transport Agency appreciates the significance of the QEII covenanted areas in the vicinity of the Project. I note that four QEII covenanted areas were avoided by the Project through the route assessment and selection processes and that, following the Council-level hearing of the NoRs, the impacts on the two QEII covenants affected by the Project were further reduced through the decision to modify the designation in Tararua District to provide for the Northern Alignment. This modification has substantially reduced the effects of the Project on the QEII covenants; the Project will now impact less than 1 hectare of QEII covenanted land (rather than 3.6 hectares, as previously).
150. The Transport Agency has engaged with QEII on a regular basis throughout to seek to address its concerns with the Project, and I am grateful for the time that QEII has taken to participate in this process,
151. The Transport Agency is committed to continuing to actively engage with QEII in respect of the ecological impacts of the Project.
152. QEII has, in particular, raised concerns regarding the sites the Transport Agency proposes to utilise to offset and compensate for ecological effects. At the time of its submission, QEII was concerned that the Transport Agency had not secured permanent legal rights to those sites. This point is addressed in the evidence of **Ms McLeod**, and I have provided an update on the position above.

Royal Forest & Bird Protection Society Incorporated (submission 15)

153. Forest & Bird has raised concerns regarding the ecological and natural character effects of the Project.
154. The Transport Agency has engaged with Forest & Bird in earlier phases of the Project. Unfortunately, Forest & Bird representatives have not been available to meet with the Transport Agency to discuss its submission.

155. The Transport Agency acknowledges the importance of the issues raised in Forest & Bird's submission. These matters are addressed in detail in the evidence of **Ms Quinn, Mr Markham, Dr Baber and Mr Evans**.

Director-General of Conservation (submission 19)

156. In its submission DOC notes its support of much of the Transport Agency's approach to managing the ecological effects of the Project, including in particular as provided for by the designation conditions, which were developed with DOC's input.

157. Additionally, DOC outlines some (reasonably limited) further conditions and measures to be applied to the resource consents, which it considers are necessary for the Project to appropriately address effects on ecology. **Ms Quinn, Dr Baber, Mr Markham, and Ms McLeod** address these additional measures in their evidence.

158. The Transport Agency has benefited from a positive working relationship with DOC throughout the development of the Project. In particular, DOC has provided valuable input into the NoR conditions and the Transport Agency's approach to offsetting effects.

159. Whilst additional work is required to completely satisfy DOC's concerns, I am pleased to have reached such a positive space with DOC in respect of this Project. Based on this, I am hopeful that DOC's remaining issues can be resolved through discussions ahead of the hearing.

COMMENTS ON SECTION 87F REPORTS

160. As outlined above, the Transport Agency has been working closely with Horizons' officers throughout the development of its application for resource consents and has strived to put forward a Project that contributes strongly to the region, aligns with the One Plan, and meets the expectations of Horizons as a regulator of natural resources within the region. I was therefore pleased to see that Horizons' section 87F reports recommend that the consents be granted, on conditions.

161. There are three points of detail in the reports that I wish to comment on briefly.

162. First, one of the reports incorrectly notes that the Te Āpiti Ahu Whenua Trust is partnering with the Transport Agency in respect of the Project. While I have had constructive discussions with the trustees and we have certainly built a close working relationship (as discussed above), the Transport Agency's

approach has been to engage with the trustees with a focus on the Project's impacts on Parahaki Island specifically, rather than on the wider Project. Therefore, the Trust is not a Project partner, in the sense that our Alliance partnering iwi are (namely Rangitāne o Manawatū, Rangitāne o Tamaki Nui-ā-Rua, Ngāti Kahungunu ki Tāmaki Nui-ā-Rua, and Ngāti Raukawa ki Te Tonga / Ngāti Kauwhata). The trustees have asked me to clarify this point.

163. Second, a number of the reports stress the importance of the Transport Agency concluding agreements with landowners to ensure certainty regarding the location of various ecological offsetting and compensation measures. I am well aware of the need to do so, because without these measures the Project cannot be delivered (including because the proposed conditions require authorisations and agreements providing for the offset and compensation to be in place before vegetation clearance authorised by the main works consents occurs). As I have explained above, good progress is being made with landowners in this regard.
164. Third, Horizons has proposed a condition (SW2) which would require the Transport Agency to establish a system for monitoring the presence of contaminants from stock effluent in stormwater runoff from the road, and to develop options for managing those contaminants if necessary. I understand this condition aims to address spillage of effluent from stock trucks.
165. The Transport Agency does not support this condition. The disposal of stock effluent on roads is not an activity that people can lawfully undertake. I do not consider that it is appropriate to create a separate process by which the Transport Agency becomes responsible for managing the effects of breaches of these requirements.
166. I note additionally that, given the improved road geometry and stormwater management systems of the Project, compared to Saddle Road, spills of stock effluent are both less likely to occur and will receive better treatment than currently exists. These improvements are explained in the evidence of **Mr Hughes** and **Mr Watterson**.

Lonnie Dalzell

12 June 2020