

under: the Resource Management Act 1991

in the matter of: Direct referral of applications for resource consents and notices of requirement to alter designations, for activities associated with the State Highway 1 / State Highway 29 Intersection Upgrade Project

between: **Waka Kotahi NZ Transport Agency**
Requiring Authority / Applicant

and: **Waikato Regional Council**
Consent Authority

and: **Matamata-Piako District Council**
Territorial Authority

and: **South Waikato District Council**
Territorial Authority

and: **Thistlehurst Dairy Limited**
Section 274 Party

and: **John Hansen**
Section 274 Party

Statement of Evidence of **Joanne Wilton** on behalf of Waka Kotahi NZ
Transport Agency

Dated: 6 July 2022

Reference: Paula Brosnahan (paula.brosnahan@chapmantripp.com)
Hadleigh Pedler (hadleigh.pedler@chapmantripp.com)

STATEMENT OF EVIDENCE OF JOANNE WILTON ON BEHALF OF WAKA KOTAHI NZ TRANSPORT AGENCY

INTRODUCTION

- 1 My full name is Joanne Ronda Wilton.
- 2 I have been employed by Waka Kotahi NZ Transport Agency (*Waka Kotahi*) since 2014. I am currently the Regional Manager Infrastructure Delivery for Waikato and Bay of Plenty. Prior to that, I held responsibilities as a Principal Project Manager and Senior Project Manager Complex.
- 3 While I am not giving expert evidence, for completeness I note the following qualifications and experience relevant to my evidence. I hold a Bachelor of Engineering (BE(Civ)) and a Post Graduate Diploma in Business Administration (PGDip(BusAdmin(Project Management))). I am a Chartered Professional Engineer (CPEng), a Chartered Member of Engineering New Zealand (CMEngNZ) and an International Professional Engineer (IntPE(NZ)/APEC Engineer). I have 23 years' experience in construction and development of infrastructure engineering.
- 4 My evidence is given in support of the Waka Kotahi notices of requirement (*NoRs*) to alter designations and applications for resource consents (*the Application*), for the construction, operation and maintenance of the State Highway 1 / State Highway 29 Intersection Upgrade Project (*the Project*).
- 5 I have been the Project Sponsor since November 2020, a role that involves governance and management responsibilities for the Project. I am also the Regional Manager Infrastructure Delivery for Waikato / Bay of Plenty and in this role am responsible for the delivery of the Project. I have personal knowledge of the matters set out in this evidence and its contents are true to the best of my knowledge and belief. I am authorised to give this evidence on behalf of Waka Kotahi.

SCOPE OF EVIDENCE

- 6 My evidence addresses:
 - 6.1 Waka Kotahi statutory role and strategic objectives;
 - 6.2 The Waikato regional context;
 - 6.3 Development of the Project;
 - 6.4 The need for the Project;
 - 6.5 Benefits of the Project;

- 6.6 Engagement with iwi partners and stakeholders; and
- 6.7 Responses to matters raised in submissions and the section 87F and 198D Report prepared by Michael Parsonson on behalf of Matamata-Piako District Council (*MPDC*), South Waikato District Council (*SWDC*) and Waikato Regional Council (*WRC*).

WAKA KOTAHI STATUTORY ROLE AND STRATEGIC OBJECTIVES

- 7 Waka Kotahi is a Crown entity constituted under the Land Transport Management Act 2003 (*LTMA*). It is the primary agency responsible for the planning, funding and delivery of New Zealand's land transport system.
- 8 Waka Kotahi is also a requiring authority under section 167 of the Resource Management Act 1991 (*RMA*) for the construction and operation of State highways and motorways, and cycleways and shared paths.
- 9 The statutory objective of Waka Kotahi 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*".¹ Waka Kotahi's functions are defined in section 95(1) of the LTMA. Relevant to the Project, these functions include:²
 - (a) *to contribute to an effective, efficient, and safe land transport system in the public interest:...*
 - (h) *to manage the State highway system (including its planning, funding, design, supervision, construction, maintenance, and operation) in accordance with this Act and the Government Roadway Powers Act 1989:...*
- 10 In meeting its statutory objective and undertaking its functions, Waka Kotahi must exhibit a sense of social and environmental responsibility, while using its revenue in a manner that seeks value for money.³
- 11 The Government Roadway Powers Act 1989 provides Waka Kotahi with powers in relation to the construction, operation, and maintenance of State highways and motorways.⁴ In particular, Waka Kotahi has sole power of control over all state highways and

¹ Section 94, LTMA.

² Section 95, LTMA.

³ Section 96, LTMA.

⁴ Sections 61 and 73, Government Roadway Powers Act 1989.

motorways for all purposes, including construction and maintenance.⁵

Government Policy Statement 2021

- 12 The LTMA requires the Minister of Transport to issue a Government Policy Statement every three financial years.⁶ The Government Policy Statement sets the direction for Waka Kotahi (and the broader land transport sector) and the outcomes, objectives, and goals that the government wishes to achieve over a 10 year period.
- 13 The Government Policy Statement on Land Transport 2021/22-2030/31 (*GPS 2021*) has four key priorities – safety, better travel options, improving freight connections, and climate change. GPS 2021 states that deaths and serious injuries should not be an inevitable cost of moving people and freight and efficient freight transport and good travel options are vital for wellbeing and economic prosperity.⁷

National Land Transport Programme

- 14 The National Land Transport Programme (*NLTP*) is a three-year programme of prioritised activities with a ten-year forecast of revenue and expenditure. It is prepared by Waka Kotahi to give effect to the GPS and is a partnership between Waka Kotahi, which invests NLTF funding on behalf of the Crown, and local government, which invests local funding on behalf of ratepayers.

New Zealand Upgrade Programme

- 15 The Project has been part of the New Zealand Upgrade Programme – Transport (*NZUP*) since 2020. NZUP is a national programme to upgrade transport infrastructure by delivering significant projects in New Zealand's six main growth areas, including the Waikato region. The Programme will invest \$8.7 billion to improve safety and provide travel choice across New Zealand.⁸
- 16 Under the NZUP, the Crown entered into a purchasing arrangement with Waka Kotahi to deliver specified projects. This funding is separate from funding provided under the NLTP, and sits outside the directions in the GPS.
- 17 However, consistent with the GPS strategic priorities, safety improvements are a key feature of the NZUP, with proposed upgrades to existing state highways focussing on preventing deaths and serious injuries.

⁵ Sections 61 and 80, Government Rounding Powers Act 1989.

⁶ Sections 84 and 86, LTMA.

⁷ Government Policy Statement on Land Transport 2021, Page 13.

⁸ 'NZ Upgrade Programme kept on track', Beehive (June 2021)
<https://www.beehive.govt.nz/release/nz-upgrade-programme-kept-track>

Road to Zero

- 18 Road to Zero is New Zealand’s road safety strategy for 2020–2030, setting out what is required in New Zealand to improve road safety. While mistakes are inevitable, deaths and serious injuries are not. The strategy provides a path to achieving ‘Vision Zero’, where no-one is killed or seriously injured in road crashes on our roads.
- 19 To achieve this, Road to Zero has an initial target of reducing death and serious injuries on our roads, streets, cycle ways and footpaths by 40 % by 2030. There are five key focus areas; infrastructure improvements and speed management, vehicle safety, work-related road safety, road user choices and system management.
- 20 The Road to Zero vision supports the Waka Kotahi statutory function of contributing to a safe land transport system. It is expected that the Project will contribute to the Road to Zero target by reducing road deaths and injuries at the SH1 / SH29 intersection.

THE WAIKATO REGIONAL CONTEXT

- 21 The Project is an important safety upgrade for the Waikato region. Both SH1 and SH29 are nationally significant freight corridors, with SH1 also having important tourism links and functions.
- 22 The current at-grade T-intersection links the three largest urban centres in the Upper Northern Island - Auckland, Waikato and the Bay of Plenty – which are home to more than half of New Zealand’s population. The intersection connects the freight and commuter corridors between the Auckland and Tauranga ports (including the new Waikato Freight Hub (Horotiu) and the Ruakura Inland Port), and the region with the Auckland International Airport, as well as providing access to minor local roads and private properties.

Waikato Regional Land Transport Plan 2021-2051

- 23 The Waikato Regional Land Transport Plan 2021-2051 (*RLTP*) sets the long-term strategic direction for land transport in the Waikato region over the next 30 years: “*An integrated, safe and resilient transport system that delivers on the well-beings of our diverse Waikato communities*”.
- 24 The RLTP has two key components, a regional policy framework that sets out land transport priorities, objectives and implementation measures, and a programme of transport activities. Both components provide strong support for the Project and emphasise the importance of early implementation:
- 24.1 The Hamilton to Tauranga strategic corridor, including SH1 / SH29 NZUP improvements, is identified as a strategic area of

focus for the Upper North Island, connecting Auckland and the Waikato with the Bay of Plenty.⁹

24.2 Safety and access improvements to the SH1 / SH29 intersection are classified as key implementation measures for Objectives 1 and 2 of the RLTP.¹⁰

24.3 Improvements to the SH1 / 29 intersection are identified as significant interregional activities.¹¹

24.4 The Waikato Regional Transport Committee has urged Waka Kotahi to implement the SH1 / SH29 Intersection Project in the 2021-24 period.¹²

DEVELOPMENT OF THE PROJECT

25 Planning for improvement works to the SH1 / SH29 intersection has a relatively long history within Waka Kotahi.

26 Improvements to the SH1 / SH29 intersection were initially to be progressed as part of the Cambridge to Piarere Long Term Improvements Project (*C2P Project*). The C2P Project is intended to provide long-term safety improvements for SH1 between Cambridge (where the Waikato Expressway ends) and Piarere (at the SH1 / SH29 intersection). A strategic case identified the need for changes to this section of SH1 in 2013 with a Programme Business Case completed and endorsed in 2015.

27 Pre-implementation of the C2P Project started in January 2018, with the aim being to lodge applications for regional consents and NoRs in July 2018. However, the Government Policy Statement on Land Transport 2018 signalled a change in key priorities, and consequently, the C2P Project pre-implementation phase was put on hold.

28 In 2020 the inclusion of the Project in NZUP led to the Project being decoupled from the 'on hold' C2P Project.¹³ This separation allows safety benefits to be realised sooner by progressing the Project as a stand-alone project, with an alternative funding source.

⁹ Waikato Regional Land Transport Plan 2021-2051, Page 33.

¹⁰ Waikato Regional Land Transport Plan 2021-2051, Page 59.

¹¹ Waikato Regional Land Transport Plan 2021-2051, Page 78.

¹² Waikato Regional Land Transport Plan 2021-2051, Page 147.

¹³ I note an error in section 3.3.1 of the Councils' section 87F and 198D which stated the SH1-SH29 intersection was decoupled from the C2P in 2015.

The Cambridge to Piarere project

- 29 Funding has now been allocated for the pre-implementation phase of the C2P project in the current NLTP.¹⁴ The Waka Kotahi Board has endorsed the detailed business case for C2P and that project is now being progressed as a route-protection project. Route protection is a planning process to identify and protect land for future public work, including transport projects.
- 30 Waka Kotahi is pursuing route protection as it provides certainty to property owners, businesses and the community, and will allow people to make informed decisions about their own land and the development of that land. Waka Kotahi was looking to lodge applications for the C2P project in December 2022, however, without access to Thistlehurst Dairy Limited (*TDL*) land, it is not currently possible to confirm a lodgement date.
- 31 No funding has been allocated for implementation of the C2P Project. Implementation includes detailed design, property acquisition, costing and construction. There is not enough allocation in the NLTP to prioritise C2P for funding before the 2027-2030 period.

Alternatives assessment for the Project

- 32 During assessment of options undertaken as part of the C2P business case process, two variations of an at-grade roundabout and two variations of a grade-separated interchange at the SH1 / SH29 intersection were considered. The roundabout options were found to perform better by providing better traffic capacity for accessing the three routes (SH1 north, SH1 south, SH29) and less environmental effects.
- 33 Following inclusion of the Project in NZUP and its decoupling from C2P, four locations for the roundabout were considered. Two options were discarded, and the remaining two (to the north-east of the existing intersection, and to the north-west of the existing intersection) were assessed using a multi-criteria analysis. This process is discussed in more detail in the evidence of Tony Innes. The north-west location was identified as the preferred option, as it performed better than the north-east option.
- 34 The option of significantly moving the connection of SH1 and SH29 to a new location outside the immediate vicinity of the current intersection was discarded at an early stage, as relocating the intersection beyond the immediate location would require more extensive land acquisition and road construction to connect the state highways to the new intersection location. This would increase effects and costs significantly, without significantly improving safety outcomes.

¹⁴ National Land Transport Programme 2021-2024, Waka Kotahi NZ Transport Agency, published August 2021.

- 35 The option of constructing a new roundabout at the same location as the existing T-intersection (i.e. "on top of" the current intersection) was also discarded at an early stage. This option would have created significant safety and traffic management issues during construction, as existing traffic flows would have had to pass through an active construction site, alternatively a temporary road would have had to be constructed on adjacent land bypassing the site, or the corridor could have been closed utilising existing local roads as a detour.
- 36 The 'offline' location of the roundabout proposed allows most Project works to be carried out without impacting the function of the current intersection. I note also the new location of the roundabout means the orientation of the four exits (including the potential C2P connection) are more equally distributed around the roundabout, which has geometry, traffic flow and safety advantages.

THE NEED FOR THE PROJECT

- 37 The current SH1 / SH29 intersection is one of the most dangerous intersections on New Zealand's roading network. In the 5-year assessment period from 2017-2021 (inclusive), there were 22 crashes at the intersection, including one fatal crash and one serious injury crash, resulting in two deaths and three serious injuries.
- 38 This high crash rate is due to the existing intersection and road alignment not providing capacity for the traffic flow that currently uses the intersection. Road users experience significant delays in the right turn movement from SH29 southbound to SH1 westbound, which impedes efficient freight movement and travel for residents and visitors in the area. These delays result in many road users taking risks by accepting small gaps in traffic to exit the intersection.

Project objectives

- 39 Waka Kotahi's specific objectives for the Project are to:
- *Improve safety for motorists and active mode users using the State Highway 1 and 29 intersection to minimise deaths and serious injuries.*
 - *Accommodate any future extension of the Waikato Expressway from Cambridge to Piarere and any future walking and cycling connections.*

BENEFITS OF THE PROJECT

- 40 The Project will improve safety by ensuring that traffic from all directions has a safe and efficient way of either turning or passing through the SH1 / SH29 intersection. Vehicles using the roundabout will pass through at a lower speed, minimising the impact of any crash that might still occur. It is expected the Project

would lead to a reduction in fatalities and injuries (currently 1.4 injury crashes per year).

- 41 Other benefits from the Project include:
- 41.1 *Provide grade separated crossings for pedestrians and cyclists.* The underpasses and shared paths provided by the Project will provide safe connections to existing and future planned trails and will significantly improve pedestrian and cyclist safety.
 - 41.2 *Improved stormwater management.* Stormwater runoff from the intersection is currently untreated. New, reliable and resilient stormwater management measures will be installed as part of the Project.
 - 41.3 *Improved route resilience and reliability.* Improved safety will reduce the likelihood of full road closure due to crashes. The new layout and dual lanes will allow single lane closures, reducing the likelihood of full closure of the intersection.
- 42 Construction of the Project is scheduled to commence in late 2022, subject to obtaining the RMA statutory approvals, and acquiring the necessary property rights.

ENGAGEMENT WITH IWI PARTNERS AND STAKEHOLDERS

- 43 Waka Kotahi has been able to better understand potential issues and benefits associated with the Project through thorough engagement with its iwi partners and key stakeholders, including local authorities, government agencies, utility companies and affected landowners.

Partnership with iwi

- 44 Waka Kotahi seeks to uphold Te Tiriti o Waitangi and recognise Māori as partners to build enduring relationships and to provide mutually beneficial outcomes.
- 45 Regular hui have been held with Ngāti Koroki Kahukura Trust and the Ngāti Hauā Iwi Trust since late 2020 to provide updates on Project development and seek feedback on matters of significance to Mana whenua. Representatives from Ngāti Koroki Kahukura Trust and the Ngāti Hauā Iwi Trust also attended a site visit with Waka Kotahi and Project technical specialists.
- 46 Since September 2021 the Raukawa Settlement Trust have also been involved in Project assessment and development. Ngāti Koroki Kahukura Trust, Ngāti Hauā Iwi Trust and Raukawa Settlement Trust have expressed support for the Project in general and, in particular, the proposed option for which Waka Kotahi is seeking approvals. All three iwi provided written support for lodging

resource consent applications and notices of requirement for the western location of the new roundabout.¹⁵

- 47 Waka Kotahi considers this engagement to have been valuable to understand outcomes of importance to iwi and to ensure these outcomes can be achieved through the designation and consent conditions. Waka Kotahi will continue to engage with its iwi partners as the Project progresses.

Consent Steering Group and Council

- 48 A consent steering group (CSG) was established in September 2020 that includes representatives from Waka Kotahi, WSP, MPDC, SWDC, WRC, the Department of Conservation and Heritage New Zealand Pouhere Taonga. The intent of the CSG is to bring Waka Kotahi and regulatory authority representatives together to:

48.1 Establish the statutory approval requirements, process, outcomes and timeframes;

48.2 Fully inform CSG members of Project developments;

48.3 Facilitate the pre-lodgement, lodgement and processing of the Project's statutory applications; and

48.4 Inform the level of information required in the AEE.

- 49 The full CSG has met several times, with subsequent regular email communication and more limited meetings as needed to discuss relevant issues. The Project team has undertaken separate regular engagement with MPDC, SWC and WRC during development of the Project and will continue to do so through the detailed design phase.

Utility companies

- 50 The Project footprint intersects with network infrastructure managed by Transpower, Powerco, Chorus and Vocus. Waka Kotahi has been working with these parties to ensure the safe identification and possible relocation and/or protection of network infrastructure.

- 51 This work will continue during detailed design to ensure relocation or protection of network infrastructure meets the utility companies' requirements. Statutory requirements cover the movement of utilities in these circumstances, contractual agreements will be, or already have been, developed for each affected network utility operator, and Waka Kotahi has proposed designation conditions to ensure the Project's construction does not adversely impact network infrastructure operations.

¹⁵ Tangata Whenua Statement and Engagement Report: SH1/SH29 Roundabout, 24 November 2021, section 5.

Landowners

- 52 Meetings have been held with the landowners whose land is required to undertake the Project, since late 2020. The purpose of these meetings was to advise the final proposed location of the roundabout, provide information about the Project design, and to seek feedback from those parties. Waka Kotahi's relationship with affected landowners has been mostly constructive and positive. I note that the relationship with TDL has been more difficult than other landowners, which is discussed below.

RESPONSE TO MATTERS RAISED IN SUBMISSIONS

Submissions in broad support of the Project

- 53 Most submitters support the Project and do not seek any additional conditions, including the Cambridge Chamber of Commerce, Ia Ara Aotearoa Transporting New Zealand, NZ Automobile Association and New Zealand Heavy Haulage Association.¹⁶ Waka Kotahi welcomes this support.

Thistlehurst Dairy Limited

Consultation with TDL

- 54 In its submission, TDL states that there had been no direct consultation with TDL until the proposal (for the Project) had been finalised, and that TDL was only provided with copies of the Updated Business Case, at almost the same time as the general public, despite making numerous requests and following a complaint to the Ombudsman.
- 55 There have been communications between Waka Kotahi representatives and TDL about the potential for TDL land to be acquired since 2017. These initial discussions were suspended when the C2P project was reviewed and Waka Kotahi restarted consultation in earnest from 2020 after the Project was separated from C2P and an option selected. There have been numerous communications between Waka Kotahi staff, Waka Kotahi agents and TDL representatives over the last two years on issues relating to land access, land acquisition and RMA approvals.
- 56 I note that TDL requested a copy of the Updated Business Case, before it had been finalised or presented to the Waka Kotahi Board for approval. Waka Kotahi generally prefers not to provide draft or unapproved versions of documents that may be subject to change, particularly when the approved/finalised version will soon be available. A copy of the Updated Business Case was provided to TDL shortly after the document had been approved. At the time of preparing this evidence, Waka Kotahi is in correspondence with the

¹⁶ Also, Dave Mawby, Ia Ara Aotearoa Transporting New Zealand, Frank Healey, Karsten Zegwaard, Louise Upston, National Fieldays Society Inc., Ross and Sheryll Watkins and South Waikato Investment Fund Trust.

Office of the Ombudsman regarding the complaint made in early 2021.

- 57 Waka Kotahi and TDL are continuing to discuss options for resolving issues between the parties.

Pre-determination

- 58 I am aware that TDL considers that construction of the roundabout will somehow 'pre-determine' or 'lock-in' the route for C2P and so restrict Waka Kotahi's decision-making powers. This contention is supported by reference to the 'spur' or 'stub', being a fourth entry/exit on the proposed roundabout, which provides scope for a connection in the future.
- 59 I entirely disagree.
- 60 Waka Kotahi is currently working (i.e. through detailed site investigations) to confirm the preferred alignment for C2P. The current preferred alignment would connect to the Project. However, Waka Kotahi does not consider the existence of the roundabout, or a fourth exit 'fixes' the end point of C2P.
- 61 Waka Kotahi must, and will, consider many factors when deciding the route and form of C2P, or any expressway extension. These factors include cultural impacts, environmental effects, traffic safety, efficiency and performance, level of service, and cost-benefit ratios. It would be negligent, if not foolish, for Waka Kotahi to consider the route and end point for C2P had been predetermined simply by upgrading of an intersection, prior to detailed site investigations having been completed.
- 62 I also disagree with TDL's contention that the location of the roundabout would have to be 'changed' if the C2P route does not connect with the Project. In the event C2P is constructed, but does not connect to the Project, then a new intersection will be constructed at the point C2P connects to the state highway network, and the intersection will be designed to connect and work with the form of the corridor at that time. The Project will remain in place, as it is required to address existing traffic problems; a connection to C2P is not required for the benefits of the Project to be realised.
- Fourth exit*
- 63 Providing for possible future road connections when a roundabout is constructed is not unusual. Including an extra exit/entry point in the roundabout design is consistent with the Project objective to accommodate any future extension of the Waikato Expressway.
- 64 Constructing a connection point now, as part of the Project, minimises future construction difficulties and health and safety effects for road users and contractors. The cost and safety risks associated with constructing a new exit on an already functioning roundabout are higher than providing for a potential connection

point when the roundabout is first constructed. The extra entry/exit point will allow a future connection to be completed in isolation from a live corridor.

- 65 The cost of constructing the fourth exit now is a very small portion of the total cost of the Project. In the context of construction and safety benefits, I consider it prudent that the design of the Project includes a future connection point – even though there is a risk that this connection point may never be used.
- 66 If the fourth exit is ultimately not required, I would expect that any paved area associated with the exit would eventually be removed and the roundabout would appear, and function, as a three-exit roundabout. However, any decisions on the fourth exit will be made by Waka Kotahi in the future, based on the circumstances at the time.
- 67 I note that the fourth exit does not require additional land for the Project. Land to the north-west of the final location of the roundabout is required for construction purposes, regardless of whether a small section of this area is ultimately partly occupied by earthworks supporting the fourth exit.
- Other safety measures*
- 68 In its submission, TDL also states that funding for the Project was sought from the government in 2019, before considering alternatives to improve safety. This is not accurate.
- 69 Concern by Waka Kotahi about safety at the SH1 / SH29 intersection has already seen safety measures implemented at the intersection that do not require significant capital works or expenditure. Median safety barriers are being progressively installed along this section of SH1, and in early August 2019, rural intersection activated warning signs (*RIAWS*) were installed on the SH1 approaches approximately 180m either side of the right-turn exit lane on SH29.
- 70 The *RIAWS* are activated when there are vehicles approaching the Intersection on SH29 to warn road users approaching on SH1. The *RIAWS* illuminate with a temporary speed limit of 60 km/h for road users on SH1 (reduced from the posted speed limit of 100 km/h). Waka Kotahi guidance is that such measures can be expected to provide a 35% reduction in injury crashes.¹⁷
- 71 While *RIAWS* provide some safety benefits, Waka Kotahi considers that this is an inadequate long-term measure as *RIAWS* rely solely on compliance of the road user with a sign, whereas a roundabout

¹⁷ Waka Kotahi (Waka Kotahi NZ Transport Agency), 2013, High-risk intersections guide, Appendix 6.

provides an intervention forcing the road user to react to the changed environment prior to entering the intersection.

- 72 It has been estimated that the roundabout option selected for the Project will result in an 87% reduction in reported injury crashes.¹⁸

Climate change

- 73 TDL considers there is insufficient explanation of how the Project has considered the effects associated with climate change and the need to reduce climate change emissions.

- 74 The Project is expected to improve traffic flow without increasing the overall number of vehicles, or changing the composition of vehicles using the intersection. Accordingly, I understand any change in traffic emissions as a result of the Project could be expected to be minimal.

RESPONSE TO COUNCILS' REPORT

- 75 I have reviewed the Councils' section 87F and 198D Report prepared by Michael Parsonson on behalf of MPDC, SWDC and WRC dated 15 March 2022.

- 76 The report suggests that Waka Kotahi confirm through evidence that there is a traffic advantage in forming the fourth exit connection during construction, so that possible future road construction activities are separated from SH1 and SH29 traffic flows. I confirm this is the case, as set out above in my response to TDL.

CONCLUSION

- 77 The Project will help progress towards the objectives of the GPS 2021, the government's objectives for NZUP and Waka Kotahi's statutory objective of providing a safe land transport system, by delivering safety benefits and improving transport outcomes for one of New Zealand's most dangerous intersections.

- 78 The Project will deliver traffic benefits through increased safety, and route resilience and reliability. Overall, the Project is supported by iwi and the community who will benefit from the improvements, including the Cambridge Chamber of Commerce, Ia Ara Aotearoa Transporting New Zealand, NZ Automobile Association, New Zealand Heavy Haulage Association and the relevant councils.

- 79 Waka Kotahi acknowledges the concerns raised through submissions and where appropriate, has been guided by technical experts in proposing conditions to respond to these concerns.

¹⁸ Evidence of Nerissa Harrison.

80 Waka Kotahi considers the significant benefits of the Project substantially outweigh any adverse effects and considers the package of conditions and other mitigation tools to be proportionate and appropriate to the Project.

Joanne Wilton
6 July 2022