

10 March 2020

Greg Bevin  
Horizons Regional Council  
11-15 Victoria Avenue  
Private Bag 11025  
Palmerston North 4442

Dear Greg

**Te Ahu a Turanga: Manawatu Tararua Highway Project  
Resource Consent Applications**

Please find enclosed an application by Waka Kotahi NZ Transport Agency (the Transport Agency) for resource consents to enable the construction and operation of the Te Ahu a Turanga; Manawatu Tararua Highway Project. Details of the nature of the resource consents sought are provided in Form 9, which is attached as Appendix A to Volume 1: Application for Resource Consent - Assessment of Effects on the Environment, and as detailed in the supporting documentation.

The application and the documentation provided in support of those applications is structured, as follows:

- Volume I: Application for Resource Consent - Assessment of Effects on the Environment
- Volume II: Design and Construction Report
- Volume III: Drawings
- Volume IV: Technical Assessments
- Volume V: Technical Assessments
- Volume VI: Cultural Impact Assessments
- Volume VII: Management Plans

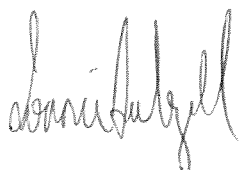
The Transport Agency requests (under section 87D of the RMA) that Horizons allows this application for resource consent lodged by the Transport Agency to be determined by the Environment Court instead of by Horizons Regional Council. A formal request accompanies this letter in the prescribed RMA form (being Form 7A). Moreover, as discussed (and as advised to the Environment Court via a joint memorandum of counsel dated 5 March 2020), the Transport Agency would be grateful for Horizons to do all it can to facilitate the prompt and efficient processing of the application.

Accordingly, the New Zealand Transport Agency also requests that the applications be publicly notified and that this task is undertaken promptly and as a matter of urgency.

With regards the deposit for lodgement, as agreed please provide an invoice to [apinvoices@nzta.govt.nz](mailto:apinvoices@nzta.govt.nz) and to refer to WBS 60053906.

If you have any queries regarding these applications, then please contact Damien McGahan (021 831 367 / [damien.mcgahan@aurecongroup.com](mailto:damien.mcgahan@aurecongroup.com)) in the first instance.

Yours sincerely



**Lonnie Dalzell**  
Owner Interface Manager

*Section 87D, Resource Management Act 1991*

**To:** Manawatū-Whanganui Regional Council ("**Horizons**")

1. **Waka Kotahi NZ Transport Agency ("Transport Agency")** requests that you allow the application for resource consents that accompanies this request to be determined by the Environment Court instead of by Horizons.
2. This request relates to an application for regional resource consents required for the construction of Te Ahu a Turanga; Manawatū Tararua Highway (the "**Project**"). The Project requires the construction of approximately 11.5km of state highway connecting Ashhurst and Woodville via a route over the Ruahine Range. The purpose of the Project is to replace the indefinitely closed section of State Highway 3 ("**SH3**") through the Manawatū Gorge. It comprises a median separated carriageway with two lanes in each direction (one lane plus a crawler lane) over the majority of the route and will connect with State Highway 57 ("**SH57**") east of Ashhurst and SH3 west of Woodville (via roundabouts). The Project also includes a Shared Use Path for cyclists and pedestrians, as well as a number of new bridge structures, including over the Manawatū River at the western end of the Manawatū Gorge.
3. The reasons for the request are as follows:
  - The Project seeks to provide an urgent solution to pressing transport and associated social problems in the region, arising from the closure of SH3 through the Manawatū Gorge, and to realise significant benefits to people living in and travelling through the region. Direct referral of the application will (subject to the Court) enable the Transport Agency to implement the Project in a timely and efficient manner.
  - A direct referral will reduce duplication and be more efficient in terms of time and costs for all parties for the reasons summarised below.
  - The Project has been the subject of numerous public engagement processes and discussions between the Transport Agency and potential submitters, which has given key potential submitters on this application and the broader public significant background in the Project and in the matters likely to be at issue in relation to the resource consents. In part that is because this application for resource consents was preceded by a designation process involving notices of requirement to three territorial authorities, which attracted 742 submissions and was the subject of a two-week council-level hearing in March/April 2019.

- Second, the matter would be likely to come to the Environment Court on appeal of any decision made in the first instance by Horizons. There is a high likelihood of appeal for the following reasons:
  - There is significant local public interest in the Project, in this application for resource consents, and in works within the Manawatū River catchment more broadly.
  - As noted above, the resource consenting process follows a designation process that attracted 742 submissions and three appeals to the Environment Court, two of which are yet to be finally determined. To the extent that there are matters at issue arising from this application, it is inevitable that evidence relating to those matters will need to be tested before the Court.
  
- The direct referral process enables effective participation by submitters and no parties will be unduly prejudiced by the direct referral process.

Date: 10 March 2020



**Jenni Fitzgerald** – Manager, Consents and Approvals – Waka Kotahi NZ Transport Agency

\*Signature of requester or person authorised to sign on behalf of requester

Electronic address for service of requester: [teahuaturanga@nzta.govt.nz](mailto:teahuaturanga@nzta.govt.nz)

Telephone: +64 4 894 5247

Postal address: Te Ahu a Turanga Project Office, Level 1, 32 Amesbury Street, Palmerston North 4410

Contact person: Lonnie Dalzell, Owner Interface Manager

\*A signature is not required if you make your request by electronic means.