



SH3 Te Ahu a Turanga: Manawatū Tararua Highway

Tolling scheme proposal

NZ Transport Agency Waka Kotahi

31 October 2024

Version 4.0

[IN CONFIDENCE]

Copyright information

Copyright ©. This copyright work is licensed under the Creative Commons Attribution 4.0 International licence. In essence, you are free to copy, distribute and adapt the work, as long as you attribute the work to NZ Transport Agency Waka Kotahi (NZTA) and abide by the other licence terms. To view a copy of this licence, visit <http://creativecommons.org/licenses/by/4.0/>.

Disclaimer

NZTA has endeavoured to ensure material in this document is technically accurate and reflects legal requirements. However, the document does not override governing legislation. NZTA does not accept liability for any consequences arising from the use of this document. If the user of this document is unsure whether the material is correct, they should refer directly to the relevant legislation and contact NZTA.

More information

NZ Transport Agency Waka Kotahi

If you have further queries, call our contact centre on 0800 699 000 or write to us:

NZ Transport Agency Waka Kotahi
Private Bag 6995
Wellington 6141

This document is available on NZTA's website at www.nzta.govt.nz

[IN CONFIDENCE]

Contents

SH3 TE AHU A TURANGA: MANAWATŪ TARARUA HIGHWAY	1
Executive Summary	4
1. Purpose	5
2. Tolling Legislation and Use	6
2.1 Tolling legislation and your role as Minister of Transport	6
2.2 Toll roads and GPS expectations	6
3. SH3 Te Ahu a Turanga	8
4. Proposed Tolling Scheme	9
4.1 Proposed design of tolling scheme	9
4.2 Project objectives and tolling SH3 Te Ahu a Turanga	10
4.3 Conclusion on the tolling scheme design and proposed toll rates	11
5. Legislative Requirements Regarding the Tolling Scheme	12
5.1 New road requirement	12
5.2 A feasible, untolled alternative route is available to road users	12
5.3 Effectiveness and efficiency of the proposed tolling scheme	12
6. Public Consultation	15
6.1 Legislative requirements regarding consultation	15
6.2 Consultation process	15
6.3 Level of engagement	15
6.4 Responses to proposed tolling scheme and key themes	16
6.5 Options for changes in response to updated modelling and stakeholder feedback	20
Appendix A – Key stakeholder summaries	25

Executive Summary

The purpose of this document is to present for your consideration a proposed tolling scheme for State Highway 3 Te Ahu a Turanga: Manawatū Tararua Highway (SH3 Te Ahu a Turanga).

State Highway 3 through the Manawatū Gorge was closed indefinitely on 24 April 2017 following a large slip and a history of landslides within the Gorge causing road closures and a high probability this would be an ongoing occurrence.

The replacement 11.5km, 4-Star KiwiRAP safety rating, highway will have a 100 km/h design speed and two lanes in each direction, including crawler lanes. Travel time is estimated to be 13 minutes for general traffic and 18 minutes for freight. The \$824m construction (funded from the National Land Transport Fund (NLTF), is expected to be completed mid-2025.

The Government Policy Statement for Land Transport 2024 (GPS 2024) sets an expectation that NZ Transport Agency Waka Kotahi (NZTA) should consider tolling to construct and maintain all new roads.

The Land Transport Management Act 2003 (LTMA) permits the establishment of road tolling schemes to provide funds which may be applied to one or more of the following activities, namely, the planning, design, supervision, construction, maintenance, or operation of a new road. NZTA assessed the suitability of tolling SH3 Te Ahu a Turanga to pay for operations and maintenance costs, initial tolling infrastructure costs, and reimbursement of some of the construction costs funded from the NLTF.

SH3 Te Ahu a Turanga satisfied NZTA internal assessments, which consider whether core legislative requirements can be met (e.g. new road, feasible untolled alternative routes are available) and the extent to which the proposed scheme is efficient, effective and represents value for money. Tolling SH3 Te Ahu a Turanga is expected to generate present value of net revenue¹ of approximately \$127 million over a thirty-five year period). This contribution of funding can supplement land transport revenue and thereby help to reduce pressure on the NLTF.

From 9 September to 7 October 2024, NZTA consulted with the public on a proposed tolling scheme for SH3 Te Ahu a Turanga. There was a significant level of participation by the community in response to the consultation, resulting in a total of 12,076 submissions being received. Overall, 9% of submitters supported the tolling proposal or offered conditional support if changes were made to the proposal, 90% of submitters did not support the tolling of SH3 Te Ahu a Turanga, and 1% were unsure. The majority of submitters who opposed the scheme or offered conditional support were either concerned with the level of the proposed toll rates, considered the road was a 'replacement' road and not a new road, and/or that the feasible alternative was not safe.

Until the most recent consultation, all engagement with the public on SH3 Te Ahu a Turanga has not positioned the road as being proposed for tolling.

After careful consideration of the feedback received, and further modelling, a number of changes to the proposed tolling scheme have been made, whilst still achieving the outcome of generating revenue to contribute to the capital, maintenance and operational costs of SH3 Te Ahu a Turanga.

¹ Net revenue is gross revenue less Goods and Services Tax (15%) and the \$0.80 per trip that NZTA retains to cover the costs of its tolling business.

1. Purpose

The purpose of this document is to present for your consideration the proposed tolling scheme for SH3 Te Ahu a Turanga: Manawatū Tararua Highway (SH3 Te Ahu a Turanga).

Between 9th September to 7th October 2024, NZ Transport Agency Waka Kotahi (NZTA) undertook a public consultation process on a proposed tolling scheme for SH3 Te Ahu a Turanga (BRI-3099 refers). After careful consideration of the feedback received, and further modelling, a number of changes to the proposed tolling scheme have been made whilst still achieving the outcome of generating revenue to contribute to the capital, maintenance and operational costs of SH3 Te Ahu a Turanga.

The matters covered in this document are intended to assist you in your consideration of whether the proposal meets the legislative requirements for tolling as prescribed in the Land Transport Management Act 2003 (LTMA). The following information is provided to support your consideration of our proposal:

- background information on tolling and current tolling schemes (Section 2)
- brief overview of Te Ahu a Turanga and its benefits (Section 3)
- a description of the proposed tolling scheme (Section 4)
- information that may assist your assessment of the proposed tolling scheme against legislative requirements, including its effectiveness and efficiency (Section 5), and
- the process, findings, and decisions following the public consultation process on the proposed tolling scheme (Section 6).

This tolling proposal presents you with a tolling scheme for SH3 Te Ahu a Turanga that has been designed to meet the requirements under the LTMA.

2. Tolling Legislation and Use

2.1 Tolling legislation and your role as Minister of Transport

The LTMA sets out the legal framework for road tolling in New Zealand. Under the LTMA, road tolling schemes can be introduced to provide funds for 1 or more of the following activities, namely, the planning, design, supervision, construction, maintenance, or operation of a new road.²

In determining the appropriate toll rates, the LTMA allows for different levels of tolls to be levied in respect of different classes of person or motor vehicles, different times or days, different directions of travel, or to be levied on any other differential basis.³

Road Controlling Authorities may submit tolling proposals to the Minister of Transport for consideration. The Minister of Transport has sole responsibility in recommending to the Governor-General the establishment of a road tolling scheme through an Order in Council. Nonetheless, you may wish to consult with your Cabinet colleagues before making such a recommendation.

In making a recommendation to the Governor-General, the LTMA requires that you must be satisfied:

- that there has been adequate consultation on the proposed tolling scheme
- with the level of community support for the proposed tolling scheme in the relevant region or regions
- that a feasible, untolled, alternative route is available to road users, and
- that the proposed tolling scheme is efficient and effective.⁴

You have discretion to determine whether the proposal meets legislative requirements and also to decide whether to recommend, modify or decline a road tolling scheme.

2.2 Toll roads and GPS expectations

There are three toll roads currently operating in New Zealand, all of which are on the state highway network operated by NZTA. A summary of the existing toll roads is presented in Table 1.

The Government Policy Statement for Land Transport 2024 (GPS 2024) sets an expectation that NZTA should consider tolling to construct and maintain all new roads.

In addition to the existing toll roads, there are three other roads which NZTA are developing tolling proposals for in parallel to the proposal for SH3 Te Ahu a Turanga. A summary of these current proposals is presented in Table 2.

In addition to these proposals, NZTA will be considering tolling for all Roads of National Significance as those projects develop.

² LTMA, section 46(1)(a)

³ LTMA section 46(3)(b)

⁴ LTMA section 48(1)

Table 1 – Current toll roads operating in New Zealand

Toll road	Light vehicles* (\$, 2024)	Heavy vehicles** (\$, 2024)	Length (km)	Light/Heavy vehicle cost per KM (\$,2024)	Date introduced
SH2 Tauranga Eastern Link	\$2.30	\$5.60	15.0	15c / 37c	2015
SH1 Northern Gateway	\$2.60	\$5.20	7.5	35c / 69c	2009
SH29 Takitimu Drive	\$2.10	\$5.40	5.0	42c / \$1.08	2005

*including motorcycles

**3,500kg and over

Table 2 – Toll road proposals in development

Toll road	Light vehicles* (\$, 2024)	Heavy vehicles** (\$, 2024)	Length (km)	Light/Heavy vehicle cost per KM (\$,2024)	Estimated road opening
SH3 Te Ahu a Turanga	\$4.30	\$8.60	11.5	37c / 75c	2025
SH1 Ōtaki to north of Levin	\$2.70	\$5.40	15.0	18c / 36c	2029
SH2 Takitimu North Link	\$4.10/3.10 ⁺	\$8.20/\$6.20 ⁺	13.8	30c / 59c	2028 (Stage 1)
Penlink	\$2.00/\$1.00 ⁺	\$4.00/\$2.00 ⁺	7.0	29c / 57c	2027

*including motorcycles

**3,500kg and over

⁺End-to-end toll rate⁺Peak/Off-peak charge

3. SH3 Te Ahu a Turanga

State Highway 3 through the Manawatū Gorge (the Gorge) is a vital connection between the west and east of the North Island. As well as providing connection between the Manawatū-Whanganui and Hawke's Bay regions it connects the communities of Woodville and Dannevirke with Ashhurst and Palmerston North. The route is classified as a National Road and carries freight traffic at a level qualifying it as an important national freight link.

State Highway 3 through the Gorge was closed indefinitely on 24 April 2017 following a large slip and a history of landslides within the Gorge causing road closures and a high probability this would be an ongoing occurrence.

There are two alternative routes available within close proximity to the Gorge route, the Saddle Road and Pahiatua Track and upgrades have been carried out on Saddle Road to ensure it is suitable for the increased traffic volumes. Works have also been undertaken on the Pahiatua Track to enable it to deal with the increase in traffic.



Figure 1 – SH3 Te Ahu a Turanga and alternative routes

The objectives⁵ of SH3 Te Ahu a Turanga are to reconnect the currently closed Manawatū Gorge State Highway 3 with a:

- more resilient connection
- safer connection than the Saddle Road and Pahiatua Track
- more efficient connection than the Saddle Road and Pahiatua Track

The 11.5km highway will have a 100 km/h design speed and two lanes in each direction, including crawler lanes. Six bridges will be built as part of the project. The new highway will have a 4-Star KiwiRAP safety rating and a maximum incline of 10%. Travel time is estimated to be 13 minutes for general traffic and 18 minutes for freight. This is slightly faster, and much safer, than the time it took to drive the closed Manawatū Gorge road.

Construction of SH3 Te Ahu a Turanga is expected to be completed mid-2025.

⁵ <https://www.nzta.govt.nz/assets/projects/sh3-manawatu/Manawatu-Gorge-alternatives-detailed-business-case-part-a-october-2018.pdf>

4. Proposed Tolling Scheme

4.1 Proposed design of tolling scheme

As a Road Controlling Authority, NZTA assesses the potential suitability for tolling of all new roads that it is responsible for. NZTA has completed a tolling assessment for SH3 Te Ahu a Turanga and has determined that it is a suitable road for tolling. The following information describes the proposed tolling scheme taking into consideration feedback from public consultation undertaken by NZTA (discussed in Section 7) and further traffic modelling and financial modelling of the tolling proposal.

Toll points

In selecting the number and location of toll points NZTA considers the following factors when determining the location of toll points:

- Equity / Fairness - the toll charges are equitable / fair for users
- Revenue – potential revenue generation
- Efficiency - revenue vs. transaction costs and capital costs
- Capital cost – level of investment needed in the tolling infrastructure.

With only two access points to SH3 Te Ahu a Turanga only a single tolling point is required and NZTA proposes a bi-directional gantry near the western start of Te Ahu a Turanga.

Toll rate

After consideration of updated traffic modelling and financial modelling, and in response to feedback received during the public consultation process (discussed in Section 6.4 below) the proposed toll prices are at a flat rate of \$2.80 for light vehicles⁶ and \$5.60 for heavy vehicles⁷.

Note these toll rates are lower than the toll rates consulted as discussed in Section 6.5. We feel that this revised scheme balances generating sufficient revenue to make a meaningful contribution to SH3 Te Ahu a Turanga with managing the transport system effects of tolling and responding to public feedback on the proposal.

We plan to defer toll collection to the first quarter of 2026 to allow the new back office to be commissioned and tested. This means road users will experience the route with a \$0 toll charge for several months before tolling would come into effect. This would also allow us to undertake necessary maintenance on the free alternatives prior to tolling commencing.

Tolling period

We are proposing that the Order in Council specifies an end date of 2060 being 35 years in duration with a review prior to the end date to consider whether the tolling period should be extended to fund ongoing operations and maintenance of the road.⁸

Toll increases

The toll rates outlined above are in 2024 dollars and would be adjusted to present day dollars at the time of the toll road opening.

We propose to then adjust toll rates every three years by the same percentage as the total percentage increase in the Consumers Price Index (all groups) (CPI) published by Statistics New Zealand rounded to the nearest 10 cents.

⁶ Light vehicles are vehicles weighing less than 3.5 tonnes, and include motorcycles

⁷ Heavy vehicles are vehicles weighing over 3.5 tonnes

⁸ LTMA section 47(3)

We propose to incorporate into the Order in Council the ability for the Agency to increase an existing toll by a greater percentage than the relative percentage increase in the CPI (if any), with written approval of the Minister.

4.2 Project objectives and tolling SH3 Te Ahu a Turanga

A tolled SH3 Te Ahu a Turanga is not expected to improve, nor negatively impact on SH3 Te Ahu a Turanga objectives of providing a more resilient connection or a more efficient connection than the Saddle Road and Pahiatua Track.

A tolled SH3 Te Ahu a Turanga will also meet the objective of providing a safer connection than the Saddle Road and Pahiatua Track. However, compared to the untolled option, there are fewer expected safety benefits with tolling as less traffic will be using SH3 Te Ahu a Turanga which has higher safety standards. Both tolled and untolled options improve safety outcomes compared to not building SH3 Te Ahu a Turanga.

Reconnect the currently closed Manawatū Gorge State Highway 3 with a more resilient connection

Tolling is not expected to negate the improved resilience benefits of SH3 Te Ahu a Turanga because it is possible to respond to situations that prevent the use of the alternative untolled routes by temporarily reducing toll rates to zero.

Reconnect the currently closed Manawatū Gorge State Highway 3 with a safer connection than the Saddle Road and Pahiatua Track

Compared to the untolled option, there are fewer expected safety benefits with tolling as less traffic will be using SH3 Te Ahu a Turanga which has higher safety standards (4-Star road as compared to a 2-star road on Saddle Road and Pahiatua Track).

Modelling suggests that the forty-year present value of safety benefits of SH3 Te Ahu a Turanga will reduce from \$24m to \$18.2m as a result of tolling.⁹ The reduction is linked to the diversion from the safer SH3 Te Ahu a Turanga, and the relative difference in crash rates between the toll road and alternate routes.

The modelling does not factor in upgrades which have been carried out on both Saddle Road and Pahiatua Track to ensure it was suitable for the increased traffic volumes when the Gorge was closed.

Reconnect the currently closed Manawatū Gorge State Highway 3 with a more efficient connection than the Saddle Road and Pahiatua Track

Light vehicles travelling on the new highway would continue to save an average of 12 minutes per trip and heavy vehicles an average of 14 minutes per trip compared to using the Saddle Road. We expect heavy vehicles will use the new highway due to significant productivity benefits including an easier, less winding route.

Economic assessments done prior to the start of construction found the drivers would see benefits from reductions in travel time costs and vehicle operating costs. Travel times on the free routes are likely to remain the same or marginally better than present.

⁹ Derived from the 2019 Business Case for Te Ahu a Turanga with reduced crash savings for different toll rates based on the forecast traffic reduction on Te Ahu a Turanga.

4.3 Conclusion on the tolling scheme design and proposed toll rates

The proposed toll scheme and toll rates have been designed to generate sufficient revenue to contribute to the cost of debt incurred during construction, operations and maintenance for SH3 Te Ahu a Turanga as well as the capital costs of tolling infrastructure. The proposed toll rates are at a level where impacts on the wider network are substantially less than the period since the Gorge was closed and still supports the objectives of SH3 Te Ahu a Turanga in delivering an efficient, reliable, and safe inter-regional state highway connection.

5. Legislative Requirements Regarding the Tolling Scheme

5.1 New road requirement

Whilst SH3 Te Ahu a Turanga provides a replacement for SH3 Manawatū Gorge the road is considered a “new road” under section 46 of the LTMA because it:

- does not currently exist; and
- traverses land that is not currently designated as, or used as, a road.

The fact that the road will be declared to be a state highway and will, in practice, replace a previous state highway does not affect whether the road is capable of being a “new road”.

It is proposed that the tolling scheme commence on the day that SH3 Te Ahu a Turanga opens for public use.

We plan to defer toll collection to the first quarter of 2026 to allow the new back office to be commissioned and tested. This means road users will experience the route with a \$0 toll charge for a number of months before tolling would come into effect. This would also allow us to undertake necessary maintenance on the free alternatives prior to tolling commencing.

5.2 A feasible, untolled alternative route is available to road users

Section 48(1)(d) of the LTMA requires that the Minister be satisfied that there is a feasible, untolled alternative route available to road users.

An equitable outcome for road users that choose not to travel on a tolled SH3 Te Ahu a Turanga is achieved through the provision of untolled alternative routes. The existing roads (Saddle Road and Pahiatua Track) would act as the feasible, untolled routes.

These roads have been determined to be feasible because:

- They have been utilised as the alternative routes since the SH3 Manawatū Gorge was closed in 2017
- Safety improvements and speed reductions have been made, which has reduced the crash rate and severity.
- The alternative untolled routes, whilst winding, are not out of context for their location.

5.3 Effectiveness and efficiency of the proposed tolling scheme

Section 48(1) of the LTMA requires that you are satisfied that the proposed tolling scheme for SH3 Te Ahu a Turanga is effective and efficient. This section provides information that NZTA considers is relevant for your consideration regarding:

- the effectiveness of the proposed tolling scheme, and
- the efficiency of the proposed tolling scheme.

Effectiveness of the proposed tolling scheme

The proposed tolling scheme would be used to provide funds that will be applied for the purposes of repayment of construction costs and ongoing maintenance and operating costs of SH3 Te Ahu a Turanga as permitted under section 46(1)(a) of the LTMA. The types of maintenance and operations costs include (not an exhaustive list) regular and periodic road maintenance, bridge inspections, road resurfacing, periodic bridge maintenance and repairs, contract management, road signage and markings, road lighting, litter removal, mowing and vegetation management, crash repairs, technology upgrades, graffiti removal and stormwater runoff.

The LTMA section 46(3)(g) provides that an Order in Council establishing a road tolling scheme may “specify, in relation to a new road, the purposes under subsection (1) for which toll revenue inflow may be used (including reimbursement of the costs related to the new road).” This allows construction costs that have been or are to be funded from the NLTF, to be ‘reimbursed’ to the NLTF through toll revenue.

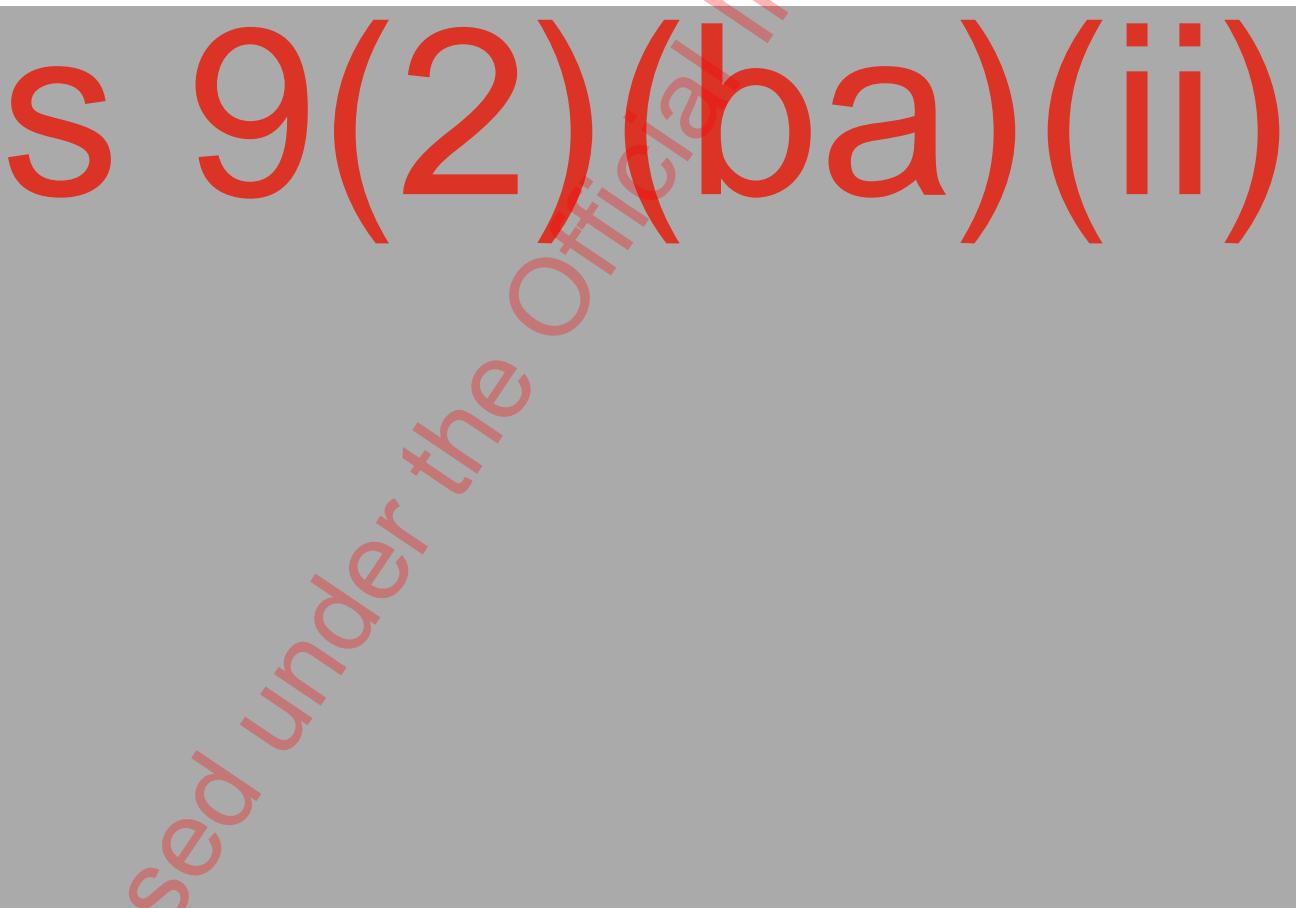
NZTA estimates Present Value (PV) of net revenue will total \$127 million¹⁰ over a 35-year period (2025 to 2060, assumed 6% discount rate). Revenue ranges from traffic modelling and financial forecasts of the NPV of revenue over a 35-year period are presented below.

We have made provision for some revenue leakage resulting from road users evading payment and also exemptions (emergency vehicles are exempted by law). Based on our experience with current toll roads, we have allowed 3% for light vehicles and heavy vehicles.

Table 3 – Risk adjusted net revenue estimates

Revenue estimate	NPV revenue (35-years, 6% discount rate)
5 th percentile estimate	\$97m
50 th percentile estimate	\$127m
95 th percentile estimate	\$168m

Tolling revenues contribution to overall project cost is presented in Figure 2 below.



¹⁰ Toll revenue estimates developed as part of this tolling proposal are not a statement of absolute revenue and will have an accuracy range commensurate with various factors such as the extent of relevant information, the certainty of data and assumptions and level of detail available at the time of preparation.

s 9(2)(j)

2. *Revenue retained for costs of the NZTA tolling business*

Section 51(4) of the LTMA permits NZTA to impose reasonable charges in connection with the administration of any form of payment. NZTA has a single back-office system that manages all three existing toll roads. NZTA currently retains 80 cents from each trip to operate its toll business, including:

- operating/maintaining/replacing/upgrading the physical assets and technology used to collect tolls from roadside gantries and cameras to back-office systems
- operating/maintaining/replacing/upgrading payment systems
- tolling related staff costs, and
- tolling related continuous improvement activities.

With respect to the proposed SH3 Te Ahu a Turanga tolling scheme, these costs would represent 31% of each light vehicle toll and 14% of each heavy vehicle toll. Over the life of the tolling scheme these costs would represent 24% of total gross revenue.

As more toll roads come on-line the average ongoing operational delivery and maintenance costs will reduce given the sunk fixed costs of the new tolling system. Whilst NZTA continues to focus on operational efficiencies and savings in tolling infrastructure costs (BRI-3210— Review of Tolling Business Operational Efficiency) the addition of SH3 Te Ahu a Turanga as a toll road would generate additional toll volumes which would contribute to overall value for money in tolling delivery.

6. Public Consultation

6.1 Legislative requirements regarding consultation

Section 48(1) of the LTMA requires that you be satisfied:

- that there has been adequate consultation on the proposed tolling scheme, and
- with the level of community support for the proposed tolling scheme in the relevant region or regions.

The following information is intended to help you formulate a view as to the adequacy of consultation and the level of support for the proposed tolling scheme.

6.2 Consultation process

NZTA undertook public consultation on the proposed tolling scheme from 9 September 2024 through to 7 October 2024.

Supporting non-technical information was produced online and via an information brochure to support the consultation.

The tolling assessment and tolling report were released during the consultation process in response to official information requests once appropriate sensitive information reviews had been completed. Time extensions were given to those key stakeholders who requested them.

6.3 Level of engagement

There was a significant level of participation from the community in the consultation process resulting in 12,076 submissions being received via online submission, email and mail. Submissions were received from the public and a range of key stakeholders reflecting a highly engaged community.

Most people we heard from live in:

- Palmerston North (3,565 respondents),
- elsewhere in the Manawātū/Whanganui region (1,859 respondents)
- Dannevirke (1,837 respondents)
- Woodville (960 respondents)
- Pahiatua (859 respondents)
- Ashhurst (831 respondents),
- and the wider Hawke's Bay region (716 respondents).

Approximately, 250 people indicated they do not live in the above regions.

The following tables show responses to two questions in the consultation which asked submitters their interest in SH3 Te Ahu a Turanga and how they would use SH3 Te Ahu a Turanga (note that submitters could select more than one response to these questions).

Table 4 – What interest did submitters have in SH3 Te Ahu a Turanga

Response	Count*	% of responses
I commute/travel through the area regularly	6,984	32%
I visit friends in the area	4,624	21%
I visit the area for recreation	3,731	17%
I work in the area	2,424	11%
I work in the area I live along / near Te Ahu a Turanga	2,037	9%
I own property or a business along / near Te Ahu a Turanga	1,243	6%
I have no link to the area	312	1%
I study in the area	249	1%

* Submitters could select more than one response

Table 5 – How would submitters use SH3 Te Ahu a Turanga

Response	Count*	% of responses
I will not use if it is tolled	6,041	42%
For recreation or to visit whānau	4,510	31%
To get to and from work	1,575	11%
Walking or cycling along this route	477	3%
To take children to school / after school activities	432	3%
Public transport along this route	399	3%
I will not use this road at all	79	1%
Other (with a prompt to specify in a comment box)	818	6%

* Submitters could select more than one response

The quantity of submissions, and data, indicates that the consultation was successful in engaging with local communities affected by the SH3 Te Ahu a Turanga tolling proposal.

6.4 Responses to proposed tolling scheme and key themes

Summary of what was proposed and feedback sought

The public consultation sought feedback on two key questions regarding the proposed tolling scheme for SH3 Te Ahu a Turanga:

- What did they think about the tolling proposal for SH3 Te Ahu a Turanga?
- Why did they think this about the tolling proposal for SH3 Te Ahu a Turanga?

The public was consulted on a single-point tolling scheme for SH3 Te Ahu a Turanga with proposed flat rate tolls of \$4.30 for light vehicles¹¹ and \$8.60 for heavy vehicles¹² (toll rates in \$, 2024).

¹¹ Light vehicles are vehicles weighing less than 3.5 tonnes, and include motorcycles

¹² Heavy vehicles are vehicles weighing over 3.5 tonnes

Overall sentiments regarding the SH3 Te Ahu a Turanga Tolling proposal

The majority of submitters did not support the proposed tolling of SH3 Te Ahu a Turanga or tolling in general (90%) with 9% supporting tolling SH3 Te Ahu a Turanga either completely or on the condition that suggested changes were incorporated, 1% of respondents were unsure. Figure 3 below shows the spread of sentiment.

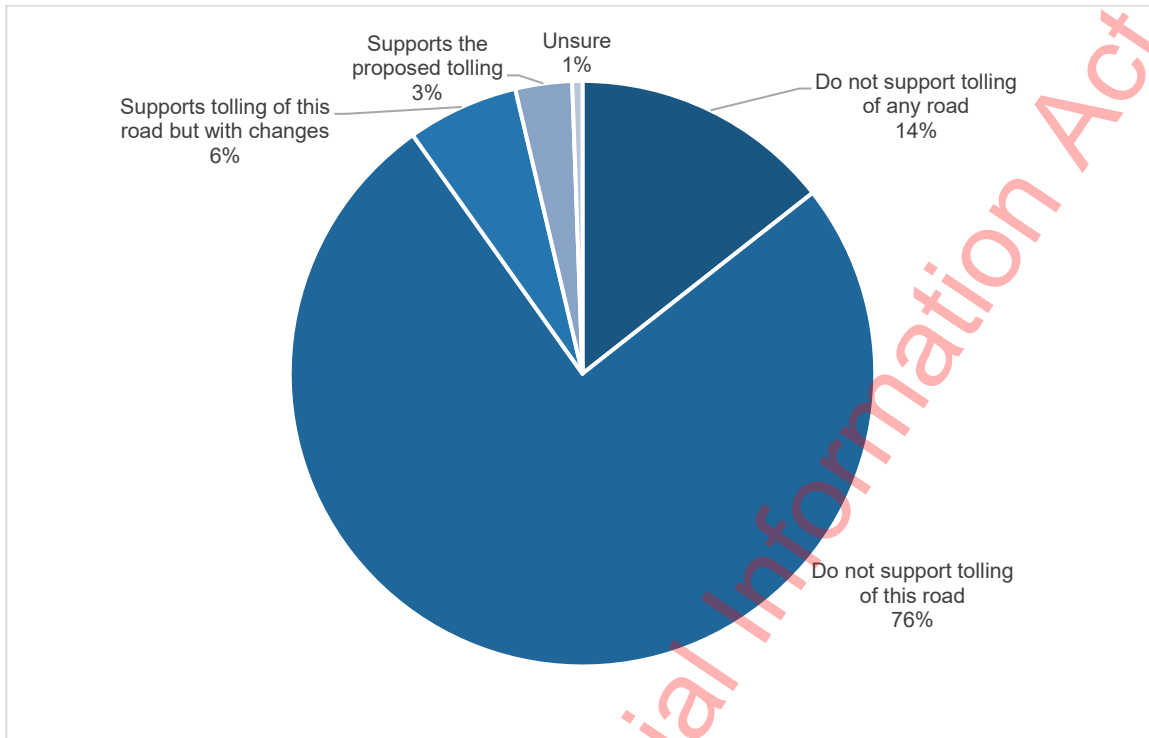


Figure 3 – Overall sentiment

Key Stakeholders

Included in the overall sentiment responses is feedback from key stakeholders. Table 6 below lists the key stakeholders who provided a submission on the tolling proposal and an indication of their support or otherwise. A summary of their submissions is included in Appendix A.

Table 6 – Key stakeholder responses

Stakeholder	Stakeholder Group	Support
NZ Automobile Association	Transport organisation	No
Ia Ara Aotearoa Transporting New Zealand	Transport organisation	No
National Road Carriers Association	Transport organisation	Yes
NZ Heavy Haulage Association Inc	Transport organisation	No
Infrastructure New Zealand	Other	Yes
Tararua District Council	Council	No
Palmerston North City Council	Council	No
Central Hawkes Bay District Council	Council	No
Manawātū District Council (MDC)	Council	No
South Taranaki District Council (STDC)	Council	Yes
South Wairarapa District Council	Council	No
Horowhenua District Council	Council	No
Hawke's Bay Regional Transport Committee (RTC)	Council	No
s 9(2)(ba)(i)	Iwi	No
	Iwi	No
	Iwi	No
	Iwi	No
	Iwi	No
	Iwi	No
	Iwi	No
	Iwi	No
	Other	No

Summary of reasons in support of proposal (3%, 378 submitters)

Tolling aligns with the user pays principle:

- Most submitters that supported the tolling of SH3 Te Ahu a Turanga expressed agreement with the user pays principle (based on the rationale that those who use or benefit from something should pay for it).

Suggested changes from those offering conditional support (6%, 743 submitters)

The submitters that offered conditional support for the proposed tolling scheme provided suggestions outlined below.

Table 7 – Suggested changes to the proposed tolling scheme

Theme	NZTA position
Reduction of toll rates to: <ul style="list-style-type: none"> encourage use price match to other tolls in New Zealand or “Half the price” 	<p>The majority of submitters who offered conditional support were concerned with the level of the proposed toll rates.</p> <p>Informed by updated modelling and taking into consideration feedback from consultation we have considered alternate toll rates as outlined in Section 6.5 below.</p>
Provide discounts/concessions for high volume users	<p>Higher frequency users receive the same benefits as less frequent users and likewise generate the need for the services funded through the tolls. We do not consider there is a basis to deviate from the user pays principle to accommodate this suggested change.</p> <p>Informed by updated modelling and taking into consideration feedback from consultation we have considered alternate toll rates as outlined in Section 6.5 below.</p>
Only charge heavy vehicles	<p>Light vehicles receive the same benefits from a well maintained and operated Te Ahu a Turanga as heavy vehicles.</p> <p>We do not consider that there is any basis to treat light vehicles differently from heavy vehicles given the user pays principle.</p> <p>This position is consistent with the other three tolling schemes currently in operation.</p>
Provide residents/ratepayers/health shuttle exemptions	<p>These users receive the same benefits as other users and likewise generate the need for the services funded through the tolls. We do not consider there is a basis to deviate from the user pays principle to accommodate this suggested change.</p> <p>Informed by updated modelling and taking into consideration feedback from consultation we have considered alternate toll rates as outlined in Section 6.5 below.</p>

Reasons from submitters that did not support tolling of SH3 Te Ahu a Turanga (76%, 9,148 submitters)

The predominant themes from submitters who did not support tolling of SH3 Te Ahu a Turanga was a rejection of the user pays principle for the tolling of SH3 Te Ahu a Turanga, that the road is not a new road and that the alternative is not safe. The main themes from the responses for not supporting the tolling of SH3 Te Ahu a Turanga and the NZTA positions are set out in the following table.

Table 8 – Reasons for opposing the proposed tolling scheme

Theme	NZTA position
Te Ahu a Turanga is a replacement highway	<p>Whilst SH3 Te Ahu a Turanga provides a replacement for SH3 Manawatū Gorge the road is considered a “new road” under section 46 of the LTMA because it:</p> <ul style="list-style-type: none"> does not currently exist; and traverses land that is not currently designated as, or used as, a road.
Tolls will further exacerbate the cost of living	<p>Road users can choose whether they would like to pay a toll to use SH3 Te Ahu a Turanga or take a feasible untolled alternative route.</p> <p>Informed by updated modelling and taking into consideration feedback from consultation we have considered alternate toll rates as outlined in Section 6.5 below.</p>

Theme	NZTA position
Tolling will discourage use and push people on to an alternate route which is perceived as dangerous/in bad condition.	Both Saddle Road and Pahiatua Track have had safety improvements to ensure they were suitable for the increased traffic volumes when the Gorge was closed and have seen significantly reduced crash rates. Traffic volumes on Saddle Road are forecast to be lower than current. Informed by updated modelling and taking into consideration feedback from consultation we have considered alternate toll rates as outlined in Section 6.5 below.
Alternative routes will need increased maintenance	NZTA's temporary responsibility for costs of maintaining and operating the alternatives routes of Saddle Road, Pahiatua Track and Ballance Valley Road will shift back to local councils on opening of SH3 Te Ahu a Turanga. While the costs of maintaining and operating these local roads may be higher compared to what councils experienced prior to 2017, NZTA will continue to contribute its share of the costs through its normal Funding Assistance Rates. Provision has been made in the 2024-27 NLTP for this transition of financial responsibility.
It should be recognised that the route is a vital connection between areas (e.g. east-west link to Palmerston North)	We do not consider this a basis not to toll SH3 Te Ahu a Turanga. Both the Tauranga Eastern Link and Northern Gateway Toll Road are vital connections between regions which are toll roads.
Tolling will have a social impact including: <ul style="list-style-type: none"> community connection via families, schools and sport creating a barrier to healthcare services 	Road users can choose whether they would like to pay a toll to use SH3 Te Ahu a Turanga or take a feasible untolled alternative route. Informed by updated modelling and taking into consideration feedback from consultation we have considered alternate toll rates as outlined in Section 6.5 below.
Tolling will create increased business & personal costs and further increase the challenges for recruitment in the education and healthcare sector	Road users can choose whether they would like to pay a toll to use SH3 Te Ahu a Turanga or take a feasible untolled alternative route. Informed by updated modelling and taking into consideration feedback from consultation we have considered alternate toll rates as outlined in Section 6.5 below.
Tolling will affect regional productivity and tourism	Road users can choose whether they would like to pay a toll to use SH3 Te Ahu a Turanga or take a feasible untolled alternative route. Traffic forecasting predicts that less than 5% of heavy vehicles will choose the free alternate route at the toll rates proposed. Informed by updated modelling and taking into consideration feedback from consultation we have considered alternate toll rates as outlined in Section 6.5 below.

6.5 Options for changes in response to updated modelling and stakeholder feedback

Updated modelling

Through the consultation process NZTA has continued to review and refine its tolling analysis using new data and information as it became available. In particular, Palmerston North City Council completed an update to its Strategic Transport Model (PNTSM) and made it available to NZTA in September 2024.

After reviewing the PNTSM, using the model directly to assess tolling was not considered suitable. However, PNTSM has allowed us to refine our analysis by:

- Enhancing the demand distribution – by incorporating a more refined range of distinct origins and destinations of vehicle trips.
- Updating travel time and distance assumptions – Allowing greater cost differences to be modelled for a wider range of origins and destinations.
- Updating future growth assumptions – Future growth forecasts in the model are less than was assumed in the initial toll modelling.

There is inherent uncertainty in all traffic modelling linked to the extent of relevant information, the certainty of data and assumptions and level of detail available. As we move away from toll rates similar to rates set historically the level of uncertainty increases as willingness to pay values¹³ used in our models have not been tested at higher toll rates to reveal their robustness. During consultation, there was significant feedback in response to underlying traffic forecasts utilised to support the tolling proposal both in actual terms and in relation to NZTA Gate 1 tests.

The methodology adopted for generating underlying estimates of future traffic in the corridor was to utilise actual observed traffic counts from 2016 prior to the Manawātū Gorge closing and factoring those up by 3% per annum. 3% was selected based on a review of observed traffic count growth in the wider network in the vicinity of SH3 Te Ahu a Turanga which ranged between 1% and 4%. It is not appropriate to use current day observations of the Saddle Road to generate traffic forecasts as the closure of Manawātū Gorge will have suppressed trips and therefore there is a component of latent transportation demand which can be expected to be realised above the levels represented by present day traffic counts once SH3 Te Ahu a Turanga is open.

In relation to Gate 1 tests, indicative volumes are used to provide an early indication of whether a potential toll scheme could be effective and efficient. It is not a binary decision as other factors such as the complexity and cost of implementation, potential toll rates and revenues are also considered. There are no minimum vehicle flow thresholds in the legislation limiting SH3 Te Ahu a Turanga being tolled.

We have reanalysed the proposed consultation option utilising up to date modelling as shown in Table 9.

Table 9 – Updated modelling of consultation option

Scenario	Light vehicle toll rate	Heavy vehicle toll rate	2025 Forecast Daily Traffic Flows (light/heavy)			% Diversion from Te Ahu a Turanga	40-year PV Safety Benefits (\$m)	35-year NPV Revenue (@ 6 discount rate)*
			Te Ahu a Turanga	Saddle Road	Pahiatua Track			
No toll	\$0	\$0	9,550/1,350	<100	1,560/220	-	24.2	-
Consultation option	\$4.30	\$8.60	5,530/1,320	3,080/10	2,510/240	37%	16.3	\$193m
Traffic model refined and updated								
No toll	\$0	\$0	9,900/1,400	<100	1000/100	-	24.2	-
Consultation option	\$4.30	\$8.60	4,000/1200	4,400/200	2,600/200	55%	14.9	\$122m

* risk adjusted P50 estimate

In refining and updating our modelling we have observed:

¹³ Derived from surveys in 2005 and updated in 2015

- Levels of diversion higher than initially modelled with 55% diversion forecast under the scheme consulted upon. This adds an additional 50% more vehicles to the Saddle Road than initially forecast.
- Higher levels of diversion reduces modelled safety benefits by 38% to 14.9m more than the 33% reduction initially predicted.
- Forecast revenue reduction from \$193m (net present value) to \$122m.

At these levels of diversion we do not believe that the revenue benefits of tolling outweigh the transport system impacts and that further consideration of the tolling proposal is warranted. We have therefore used the updated modelling to consider further tolling options as outlined below.

Consultation feedback and toll rates

A significant amount of feedback relates to either:

- the toll level being too high
- the impact of tolling on communities, organisations and individuals.

Other than not wanting any toll, some respondents offer suggestions to mitigate the impact of tolling through discounts or exemptions for a wide range of user groups. As noted in Section 6.3 and Section 6.4 above, we do not believe that offering exceptions or discounts for sections of users is a fair interpretation of the user pays principle and that a more appropriate mitigation for the large number of concerns would be to review the proposed toll rates.

The last toll rate to be set in New Zealand was in 2015 when the Tauranga Eastern Link road was established. This continued a precedent of toll rates in New Zealand being set at low levels by international standards¹⁴. In response to GPS 2024, NZTA has developed toll scenarios which aim to make a more meaningful contribution to capital improvements and on-going operations and maintenance than historically realisable, whilst ensuring the new road continues to deliver transport benefits for New Zealand.

As shown in Table 1 and Table 2, as we transition away from historically lower toll rates, SH3 Te Ahu a Turanga is at the higher end of toll rates on a cents per kilometre basis. On further consideration of stakeholder feedback and the proposed toll rates for SH3 Te Ahu a Turanga relative to other toll road proposals, we think a more gradual progression to lifting toll road rates in New Zealand could be considered.

Post-consultation options considered

As discussed above, under the proposed toll scheme the updated tolling analysis shows higher levels of diversion than initially modelled, with consequential revenue and safety impacts. NZTA believes that this level of diversion is undesirable given the increased volume of traffic on Saddle Road and associated increased crash risk. We have therefore considered 4 additional tolling scenarios – 3 which aim to lower the levels of diversion and also respond to community feedback in a way which retains an effective and efficient toll scheme and an updated revenue maximising option. The options considered are:

- Option 1 – Reduces the toll rate for light vehicles but maintains the heavy vehicle rate at the consultation level
- Option 2 – Reduces both toll rates, setting the heavy vehicle rate multiplier at two times the light vehicle rate.
- Option 3 – Sets toll rates at lower levels
- Option 4 - The option which maximises total net revenue

¹⁴ https://australasiantransportresearchforum.org.au/wp-content/uploads/2022/05/ATRF2021_Resubmission_122-1.pdf

Table 10 – Post-consultation tolling options

Scenario	Light vehicle toll rate	Heavy vehicle toll rate	Light vehicle cost per KM (\$2024)	2025 Forecast Daily Traffic Flows (light/heavy)			% Diversion from Te Ahu a Turanga	40-year PV Safety Benefits (\$m)	35-year NPV Revenue (6% discount rate)*
				Te Ahu a Turanga	Saddle Road	Pahiatua Track			
No toll	\$0	\$0	-	9,900/1,400	<100	1000/100	-	24.2	-
Consultation option (updated)	\$4.30	\$8.60	37c	4,000/1200	4,400/200	2,600/200	55%	14.9	\$122m
Option 1	\$3.50	\$8.60	30c	5,100/1200	3,200/200	2,600/200	45%	16.5	\$135m
Option 2	\$3.50	\$7.00	30c	5,100/1200	3,200/200	2,600/200	44%	16.6	\$119m
Option 3	\$2.80	\$5.60	24c	5,700/1400	2,700/50	2,530/150	38%	18.2	\$127m
Option 4 ¹⁵	\$5.00	\$12.20	43c	3,000/1,000	5,400/300	2,600/170	65%	13.2	\$146m

* risk adjusted P50 estimate

Option 1 and Option 2 reduces volumes of traffic on the Saddle Road to levels marginally higher than anticipated in our original modelling of around 3,100 vehicles per day with safety benefit similar to those initially forecast at around \$16.3m. Whilst modelling suggests that Option 1 and Option 2 are largely equivalent, this is due to the level of precision in the model. It can be expected that there would be more freight utilising SH3 Te Ahu a Turanga at the lower toll rate with less utilising the Saddle Road.

Given the considerable feedback from submitters on the perceived safety of the free alternative routes (in particularly Saddle Road) we have undertaken a high-level assessment of crash rates on Saddle Road both before and after the road closure, as set out below, to help further inform our final proposal.

Table 11 – Saddle Road crashes

Scenario	Before closure (Low volume)	Post closure (High volume)
Time period ¹⁶	11 years (2000-2010)	5 years (2019-2023)
Crashes	10	74
Deaths & Serious Injuries	0	17
Injuries per crash	0.3	0.49
Crashes per annum	0.91	14.8
Traffic volume	150 vehicles per day	5,100 vehicles per day
Crash rate	1.66 per 10,000 vehicle movements	0.83 per 10,000 vehicle movements
Injury	0.50 per 10,000 vehicle movements	0.39 per 10,000 vehicle movements

¹⁵ Note: At these toll rate levels, the model is very sensitive, resulting in a large range for lower and upper bound estimates. Tolls at this level are unprecedented in New Zealand and there is limited to no data available to benchmark the level of response that could be expected.

¹⁶ Manawatu Gorge first closed in 2011 for about a year then closed again in 2017 permanently. The speed limit on Saddle Road was reduced to 80km/h as an emergency speed limit in 2018, then permanently reduced in January 2019 to what it is today. Due to the significant changes in volume, speed etc, data between 2011 to 2018 has been discounted.

The data shows us that on Saddle Road has been an increase in injury rate from 0.3 injuries per crash with minimal traffic to 0.49 injuries per crash with traffic rerouted from the Manawātū Gorge. From a review of the crashes, the change in injury rate was partially to do with an increased likelihood of hitting another vehicle (as this became more likely) and the types of vehicles using the road.

The main cause of the increase in crash numbers was the increase in the number of vehicles; this is an increase in exposure where more vehicle movements essentially means more crashes.

When crash rates are compared based on traffic volume, we see that the crash risk reduced by half from 1.66 crashes per 10,000 movements to 0.83 crashes per 10,000 movements. The injury rate dropped by a lower proportion from 0.5 to 0.39 injuries per 10,000 movements. This reduction is in part due to the physical improvements made to the Saddle Road (barriers, shoulders, signs), with the lower speed limit also having a significant impact on improving safety.

We may expect the following with the introduction of a toll on SH3 Te Ahu a Turanga, assuming no further improvements are made to the Saddle Road, that the speed limit is not increased, and that it is maintained to a similar standard:

- less vehicles leading to fewer crashes
- An increase in speeds as drivers will be more likely to be able to select their own speed with less traffic on the Saddle Road, particularly heavy vehicles.

The increase in speeds is expected to result in a higher crash rate than currently occurs. The crash rate is expected to be above the 0.8 crashes per 10,000 vehicle movements but less than the 1.66 crashes per 10,000 vehicle movements provided the speed limit remains.

Option 3, whilst having a significantly reduced toll rate compared to the consultation option, performs well in terms of reduced trip diversion (limiting any safety risk), safety benefits relative to an untolled road and total net revenue. Total net revenue is forecast to be \$127m (present value over 35-years at 6% discount rate) which is higher than the updated forecasts for the consultation option (\$122m).

Option 4, which maximises revenue has significant levels of diversion (65%) and 40% more traffic on the Saddle Road than on SH3 Te Ahu a Turanga¹⁵. This significantly erodes safety benefits of the project and is not recommended based on the impact of such toll levels on the transport system and objectives of SH3 Te Ahu a Turanga.

Recommended toll option

In reaching a decision on a final tolling proposal recommendation, the NZTA has considered:

- Government priorities for transport and direction given with respect to tolling as set out in GPS 2024
- The requirements of the LTMA
- The objectives of SH3 Te Ahu a Turanga and transport system impacts of tolling
- Observed crash history on Saddle Road
- Significant levels of public and stakeholder feedback on the consultation proposal
- Updated and refined toll modelling

After consideration of the above it is proposed to amend the proposed tolling scheme by reducing the flat rate for light vehicles from \$4.30 to \$2.80 and for heavy vehicles from \$8.60 to \$5.60, as per Option 3 in Table 10 above.

This option is forecast to make a meaningful contribution towards the construction, operation and maintenance of SH3 Te Ahu a Turanga. At the proposed toll rates SH3 Te Ahu a Turanga is expected to continue to meet the objectives of project in delivering an efficient, reliable and safe inter-regional state highway connection and provide better alignment and equity to existing toll roads.

Appendix A – Key stakeholder summaries

Roading and Transport organisations

Stakeholder Name	Sentiment
NZ Automobile Association (AA)	Do not support
<p>Recognises tolling new roads can assist with their delivery, and is open to tolling new roads in principle, however the decision to toll:</p> <ul style="list-style-type: none"> Should be linked to the decision on whether and when to construct the road, and consultation therefore undertaken ahead of construction Be considered if it means a road can be built earlier than would be possible using National Land Transport Funds (NLTF) or other funds Makes sense when it will achieve a positive overall network outcome across both the new and alternative route(s) Tolling should not be undertaken solely for covering maintenance and operational costs, as these activities should be the first call on funding from the NLTF. <p>The AA oppose the proposal to toll Te Ahu a Turanga: Manawātū Tararua Highway on the basis that the above principles have not been met.</p>	

Stakeholder Name	Sentiment
Ia Ara Aotearoa Transporting New Zealand	Do not support
<p>Supports tolling in principle</p> <ul style="list-style-type: none"> As a supplementary revenue-raising tool to support much needed improvements to the state highway network, and Roads of National Significance, subject to funds from road user charges, fuel excise and vehicle registration should predominantly be used to pay for road construction and maintenance, Commercial Vehicle Safety Team enforcement, and low-level subsidies of public transport operating costs. Tolling be used sparingly, and only on roads with appropriate tolling assessments, given the substantial contribution that road users make through user charges. Heavy trucks already make the highest proportional contribution to their public sector costs of all travel modes. Requests closer engagement between NZTA and the road freight sector to properly assess the proposed toll rates. Does not support tolling for the Manawātū Tararua Highway for the following reasons: <ul style="list-style-type: none"> Manawātū Tararua Highway cannot be accurately characterised as a "new road", for the purposes of tolling consideration. The tolling assessment for the Manawātū Tararua Highway does not support the introduction of the proposed toll. Road freight operators incurring the tolls will have no choice but to pass these on to freight customers and ultimately consumers. 	

Stakeholder Name	Sentiment
Heavy Haulage association	Do not support
<p>The members of the NZ Heavy Haulage Association (referred to in this document as HHA) are governed by the restrictions for the transport of over dimension loads in Schedule 8 of the Land Transport Rule: Vehicle Dimensions and Mass (VDAM). This Schedule does not allow the transport of goods that are anything but the smallest over dimension loads on roads that are tolled.</p> <ul style="list-style-type: none"> HHA noted they are unable to support a toll on the Manawatu Tararua Highway, without a change to VDAM being undertaken. They stated "While explicit Authority can be issued by NZTA under Schedule 8, in our experience of advocating for these, these taken a long time to gain, and this is not the best solution." In their view, over dimension loads will be able to travel more efficiently and far more safely on the Manawatu Tararua Highway compared to the Saddle Road or the Pahiatua Track and suggest the VDAM Rule must be changed to allow the use of the new road in advance of it opening. 	

Stakeholder Name	Sentiment
National Road Carriers Association	Support the toll
Noted that the project provides a more resilient and productive link between Manawatu and Hawkes Bay, specifically mentioning the replacement is 4 lanes, providing a safer option.	
Mentioned that tolling will address the cost blow out of the project, reducing the impact of the blowout on the NLTF.	

Stakeholder Name	Sentiment
Infrastructure New Zealand	Support the toll
Infrastructure New Zealand suggest that tolling is a more equitable and transparent approach to capturing revenue, to increase infrastructure spend.	
<ul style="list-style-type: none"> Recognise that New Zealand cannot use status quo funding mechanisms for reliance to properly maintain, renew and replace transport assets. The demand for world class infrastructure must to be supported by a user pays approach. With decreasing revenue from fuel excise duty and road user charges, tolling must be in place for all future roads. This will establish "user pays" with New Zealanders, preparing the public for full time electronic pricing in the future. Suggest that a cross-political spectrum agreement is needed, and highlighted disappointment that Transmission Gully was not tolled. 	
With regards to Te Ahu a Turanga: Manawatū Tararua Highway specifically	
<ul style="list-style-type: none"> The increase in costs reflects the inflationary construction environment however this highlights the need to secure wider sources of revenue. Recognised the proposed toll "less than the cost of one hour's parking in a main centre" Benefits go beyond significant travel time savings, with the new route safer, more efficient and reliable. In the case for heavy vehicles the travel time and fuel reductions due to a better gradient will serve to offset the toll free. Other toll roads have had higher usage once opened as people experience the benefits. Supports the use of the NZTA tolling back office to support the toll scheme and expect transaction and administration costs reducing over time. Highlighted the need for NZTA to work closely with the community to assist with transitioning to a user pays environment including assistance with opening tolling accounts and readily available Q&A responses. 	

District Council

Stakeholder Name	Sentiment
Tararua District Council	Do not support

Tararua District Council (further referred to as TDC) do not support the proposed toll, or a toll of any amount, on the Te Ahu a Turanga: Manawatū Tararua Highway. They are deeply concerned that tolling was never discussed throughout land acquisition and the consenting process and know it would have led to very different conversations, especially with Iwi.

- TDC do not consider this road meets NZTA's criteria for its own Tolling Policy
- Noted that they have been asked by members of the community to consider a request for a judicial review of this consultation, due to expectations of Section 48 of the Land Transport Management Act 2003 not being met in respect to no regional or community support for the proposal, and a consultation process undertaken without timely sharing of key information including the Tolling Assessment and Assessment Reports. TDC asks "How can a submission be fairly assessed if the tolling assessment wasn't available?"
- While TDC does recognise the financial challenges associated with constructing and maintaining transport infrastructure and understands the rationale for considering tolling as a means of alleviating pressure on the National Land Transport Fund, they feel this toll proposal does not adequately account for the unique situation in their district.

TDC prepared an extensive submission, and while the below summarises its contents; it is recommended that the submission is read in its entirety.

Tolling not included in previous stages

- Tolling was not considered during the Detailed Business Case or on approval of construction, or at any point during the project's development.

Not a new road

- Te Ahu a Turanga: Manawatū Tararua Highway is a replacement road for SH3 that was irreparably damaged by slips in 2017 and was permanently closed. The Detailed Business Case for the highway repeatedly references the 'replacement road'.
- It is not a significant upgrade – the original SH3 it replaces was flat and took seven minutes. The highway is a significant upgrade only when compared to the two local detour roads that have carried state highway traffic due to there being no other alternative.

Alternatives

- TDC highlights the Saddle Road and Pahiatua Track are not feasible or safe.
- NZTA has also acknowledged the alternatives are unsafe, notably in the Detailed Business Case, as well as in 2019 when a permanent speed limit of 60km was introduced for the Saddle Road because the accident rate had increased 88%.
- Over 155 reported accidents have occurred on the Saddle Road since 2018 and three people lost their lives between 2018 and 2020. The Pahiatua Track is almost as dangerous with around 13 accidents a year. TDC feels this is an unacceptable level of safety.
- "No amount of maintenance can make these alternative routes safe for the volume of traffic likely to continue if the highway is tolled, due to their inherently narrow, windy and steep terrain that allows no room for error."
- TDC mentions the roads are also not feasible or resilient alternatives due to the number of days a year they are closed.

TDC is taking the firm stance of not taking back the Saddle Road, Pahiatua Track and Ballance Valley Road once the highway opens if it is tolled, due to the unaffordable maintenance costs. They have additionally requested current maintenance costs and believe these to be in the millions annually.

- It is requested that the maintenance costs for the alternative routes be included in the tolling assessment as a cost.
- TDC shared that if the highway was free, as originally intended, NZTA would only be maintaining one road and maintenance for the alternate routes would revert to Council

Traffic volumes are insufficient to meet the criteria

- TDC calls into question the tolling assessment measures, the timings it was supplied within (partway through the consultation), as well as the lack of publicly available information. They feel "This is highly irregular and draws into question the reliability of the tolling assessment and the robustness of the consultation process."

- This is further reiterated with TDC suggesting the areas where NZTA place their counters do not provide an accurate view, as they collect a higher number of vehicles that do not continue on the road.
 - "A portion of local traffic travelling from Pahiatua to Palmerston North is likely to continue to take the Pahiatua Track even if the highway is not tolled, as the Pahiatua Track is the most direct route to the Massey end of the city and the centre of Palmerston North, with a travel distance 10km less than the replacement road. Traffic from the Wairarapa will also likely continue to use the Mangamaire-Pahiatua Track route, with is 19km less than taking the highway."
- Due to this factor, TDC requests that the tolling assessment allows for this likelihood and deducts a realistic Pahiatua Track portion from the total potential highway traffic volume.
- The TDC roading team shared data from their 7-day count, noting The Saddle Road counter reported 6935 total vehicle movements with 16.63% heavy vehicles. The Pahiatua Track reported 3001 total vehicle movements with 14.3% heavy vehicles. This is a total of 9936 vehicle movements a day.
- They believe more than the 37% proposed would use the alternate routes due to the tolls price, further eroding the potential traffic that may take the highway.

Tariff

- TDC noted that Gate 2 of NZTA's Tolling Policy requires the toll tariff to be reasonable and not to result in a traffic volume change that unduly impacts the wider network. The proposed toll of \$4.30 for a light vehicle and \$8.60 for a heavy vehicle is cost prohibitive for most people in their district. TDC believe this will drive higher usage of the alternatives than accounted for.
- The Tararua District has high levels of deprivation and low income and is heavily reliant on the Palmerston North Hospital and surrounding health services. A toll would be disadvantageous to those people who travel to receive care.
- As the traffic that may pay a toll is heavily reduced due to the high cost, TDC do not consider that a toll on this road would make a meaningful contribution to the NLTF.

Negating the project purpose and outcomes

- NZTA's business case for the new highway emphasised the importance of providing a safe and efficient route for the residents of Tararua and Manawatu. However, if a significant portion of residents avoid the toll road due to the cost, this goal will not be achieved.
- In recalculating the 2018 Business Case Benefit Cost ratio with increased traffic on the alternative routes, the value significantly reduced. Given this drop in benefit value, TDC believe a more thorough assessment of the impact of the toll proposal is required.
- From the outset, this project has been promoted to the TDC community as 'more than a road'. TDC feel it would be "Ironical and damning, if at this late stage, a toll is imposed that would handicap the Tararua economy and prevent the project purpose being realised."

Social and economic harm for the Tararua community

- TDC believe there are equity concerns with tolling, as it would disproportionately impact the most vulnerable members of their community.
- The impact of the 7 years of Gorge closure has been strongly felt by this community, and the area continues to be impacted by the ongoing effects of Cyclone Gabrielle.
- These factors, plus the toll, will contribute to slowing economic recovery efforts even further, on top of likely increases in freight costs.
- Tolls will impact access to critical healthcare providers in Palmerston North, and students will have decreased accessibility to social programmes such as sports and school initiatives due to parents not being able cover increased costs.

In summary, TDC believe the negative impacts on their community far outweigh the potential benefits for the national transport network.

TDC also noted they are grateful for the far-reaching support that has been forthcoming from Councils around the north island.

Stakeholder Name	Sentiment
Palmerston North City Council	Do not support
<p>Palmerston North City Council (PNCC) are disappointed with the lack of transparency around the consultation process, with the tolling assessment was not made available from the outset.</p> <p>PNCC Council oppose the proposal to toll Te Ahu a Turanga Highway for the following reasons:</p> <ol style="list-style-type: none"> 1. The proposed tolling is retrospective and not part of the original planning, indicating that it was assessed as an economically viable project without a toll. 2. Te Ahu a Turanga is a replacement road for the closed State Highway 3 through the Manawatu Gorge and not a new road. 3. The proposed toll rate is nearly double the rate of existing tolls and other proposed toll roads. It is not clear how this rate is justified and appears the revenue will be additional and was not forecast during the business case stage of the project. 4. The proposed toll will have a significant financial and social impact on local communities including low-income households that rely on the road for work and other essential travel. 5. The non-toll alternatives are not viable, being unreliable connections that face resilience issues and frequent closures. 6. NZTA will look to return responsibility for maintaining the non-toll alternatives to PNCC and TDC, which will be incredibly challenging given the number of vehicles that will continue to use these roads. 7. The non-toll alternatives were not designed for that level of traffic are forecast by NZTA, resulting in an increased financial burden on the local councils and the community, who will be responsible for maintaining these roads to a safe standard. 8. Te Ahu a Turanga does not meet the criteria required to be tolled. One of the criteria is that there is 'not less than 10,000 vehicles are likely to travel the road per day', however NZTA's assessment is there will be 6,000-7,000 vehicle movements per day. Even accounting for growth, the diversion rate will see less than 10,000 vehicle movements per day. <p>PNCC's submission goes on to provide feedback for approaching future tolling proposals.</p>	

Stakeholder Name	Sentiment
Central Hawkes Bay District Council (CHBDC)	Do not support
<p>CHBDC are disappointed with the engagement process, which they believe does not adequately reflect the inter-regional impact and significance of the proposed toll on residents and businesses. CHBDC also question the business case data and request the opportunity for further discussions.</p> <p>While CHBDC support tolling in principle, in this case they oppose the toll on the basis that:</p> <ul style="list-style-type: none"> • Te Ahu a Turanga is a road of significance and services the entire East Coast of the North Island. • The route is a major connector between the Te Utanganui Inland port and the Port of Napier. • The rationale for the toll does not have any clear benefits other than reducing the burden on the National Land Transport Fund on a region that is already experiencing heightened transport costs and impacts from Cyclone Gabrielle. • Disproportionate impact in a region with lower-than-average income • Alternative routes are unsafe and significantly longer • Restrictive access to major, central North Island healthcare hub • Higher pricing in comparison to other toll roads in NZ • Increased maintenance expectations for Tararua District Council • The use of tolls was not included in the original business case for Te Ahu a Turanga. Support for the new road was received on the understanding that this new route would remain free for users • Tolling the road will not unlock its economic potential in the area 	

Stakeholder Name	Sentiment
Manawātū District Council (MDC)	Do not support
<p>MDC does not support the tolling proposed for Te Ahu a Turanga: Manawātū-Tararua Highway for the following reasons</p> <ul style="list-style-type: none"> A tolling proposal did not form part of the original business case. Noted that the project must have been assessed as economically viable prior to its implementation. Te Ahu a Turanga: Manawātū-Tararua Highway is a replacement road for the closed State Highway 3 through the Manawātū Gorge. The toll being proposed is almost double the current toll prices for northern motorways, with no explanation in the consultation material, particularly given that it is shorter (11.5km compared to 15km) than the Ō2NL. MDC shares the Tararua District Council's concerns regarding the validity of the NZTA modelling forecasts. The proposed toll will increase the social inequity for low-income households, with significant impact on commuters with the proposed weekly toll costs totalling over \$40. NZTA has stated the proposed toll will be used to finance NZTA nationally prioritised projects - they noted that there are no nationally prioritised (RoNS) projects in the Manawātū region. <ul style="list-style-type: none"> If NZTA decides to toll, MDC requests that the toll pricing be set at no greater than \$2.20 for light vehicles and \$5.40 for heavy vehicles. Additionally, MDC requests that NZTA publish its data and assumptions behind its estimate of 10,902 vehicles likely to travel on Te Ahu a Turanga: Manawātū-Tararua Highway per day, particularly given how close this estimate is to the policy threshold for tolling of 10,000 vehicles per day. <p>MDC is concerned about the impact of the proposed tolling on the condition of the Saddle Road. Manawātū District Council was responsible for a 2km portion of the Saddle Road previously.</p> <ul style="list-style-type: none"> MDC believes a greater proportion of people will continue to use the Saddle Road if tolls go ahead. <p>MDC's preferred option is that the Saddle Road retain its State Highway designation in perpetuity. The ownership and maintenance of the Saddle Road would then remain the responsibility of NZTA.</p> <ul style="list-style-type: none"> If Te Ahu a Turanga: Manawātū-Tararua Highway is to be made a toll road, commencement delayed until 2 – 5 years after the road becomes operational. If the Saddle Road is to be returned to local authority ownership and responsibility, that NZTA commit to: <ul style="list-style-type: none"> Reinstating the road to a condition it was in prior; Providing local authorities with all of the information necessary to reintegrate these roads into their asset management and forward work programmes Allocating a portion of the toll revenue to local authorities to cover maintenance That NZTA supply detour and approach signage requirements before MDC would allow Saddle Road to be used as a detour in major crisis <p>MDC supports in principle the tolling of future new State Highways, however this support is contingent on:</p> <ul style="list-style-type: none"> Tolling forms part of the business case at the outset The toll pricing does not financially burden the communities served by the road, and in line with existing toll pricing. Councils are provided with a portion of the toll revenue to cover maintenance of local roads that are alternative routes Once toll revenue covers the cost of the road, that funds are ringfenced for other key regional transportation projects (such as the Regional Freight Ring Road) <p>MDC also submits in support of the submissions prepared by the Horowhenua District Council and the Tararua District Council.</p>	

Stakeholder Name	Sentiment
South Taranaki District Council (STDC)	Supports the toll
<p>STDC supports the road tolling schemes proposed for the three new state highways in the North Island.</p> <ul style="list-style-type: none"> Toll schemes for the three new highways will be extremely beneficial for the future of land transportation in New Zealand. A concern for STDC is that transport costs for state highways are pulling local roading funds away from where they are truly needed. Tolling will allow the highway to generate its own revenue and offset financial pressure on the NLTF and local roading funds. This means local roading funds can stay within districts to support the maintenance of roads and streets that exist for the benefit of local and rural communities. STDC also asks if central government to explore other forms of funding for state highways such as Private-Public Partnerships (PPPs) and congestion/time of place charges. We, as a Council, support the proposed road toll scheme for the Manawātū Tararua Highway, with respect also being given to the frustrations of the local communities that have been affected by this decision this late in the construction phase. 	

Stakeholder Name	Sentiment
South Wairarapa District Council	Do not support
<ul style="list-style-type: none"> This is a long awaited direct replacement road for the Manawātū Gorge road and should be free to use. Highlighted the safety risk to people avoiding toll – neither Pahiatua Track nor Saddle Road to be suitable alternatives, they are dangerous and not fit for purpose <ul style="list-style-type: none"> Additionally maintenance that will be required on the Saddle Road is in the millions of dollars and is not worth spending on an already dangerous road. The combination of heavy use on fragile roads combined with bad weather causes considerable costs to councils and ratepayers There is significant economic damage to Tararua residents - where the median income is \$26,300 and only 9.8% of the population earn over \$70,000. For those who commute most days the cost could be nearly \$2000 per year. This includes many tertiary students Question the supplied numbers, particularly with regards to the 10,000 minimum They feel that to announce tolling at this late stage is a breach of NZTA's usual policy which states that tolling can be taken into account either in the detailed business case, prior to construction or on approval for construction. 	

Stakeholder Name	Sentiment
Horowhenua District Council	Do not support
<ul style="list-style-type: none"> Supports the submissions from Tararua and Manawātū District Councils, as well as Horizons Regional Council, regarding the Te Ahu a Turanga: Manawātū-Tararua Highway tolling proposal for the reasons outlined in their submissions. Acknowledge that this highway serves as a replacement for a closed route, making tolling inappropriate. Agree with their partners that seeking contributions from local road users is not justified in this context. The Council urges stakeholders to consider the implications for community well-being during the consultation process. 	

Stakeholder Name	Sentiment
Hawke's Bay Regional Transport Committee (RTC)	Do not support
<ul style="list-style-type: none"> The RTC recognises the overall benefits of tolling for new roads with an economic benefit. They We acknowledge the significant funding constraints NLTF, and understand the need to explore alternative funding mechanisms, including tolling. They suggest that tolls should be set at a reasonable level, and once the investment is recovered tolls be reduced to a level that supports maintenance & operations only. If tolls are retained at original levels once the initial investment recouped, the additional capital should be invested locally. It's important to ensure costs are controlled during construction as pushing rising costs on users reduces their willingness to pay, ultimately undermining the purpose of tolling. 	

- Tolls should only be applied to infrastructure and not as a mechanism for funding the replacement of existing routes. Tolling an upgrade risks public backlash
- The imposition of tolls on a replacement road may drive traffic onto less suitable, lower-standard local roads, causing congestion, safety concerns, and increased maintenance costs. The alternative routes are not viable due to distance, poor road quality, or longer travel times.
- Specific feedback related to Te Ahu a Turanga / Manawātū Tararua Highway:
- The RTC supports the efforts made by NZTA to date on the Manawātū Tararua Highway corridor. We strongly support investments that secure reliable and resilient journeys into and out of our region, particularly as this corridor forms a key strategic link for Hawke's Bay.
- An additional concern was noted that tolling the Te Ahu a Turanga / Manawātū Tararua Highway sets a precedent that could impact the proposed four-laning of the Hawke's Bay expressway.

The RTC opposes the toll for the following reasons.

- The RTC views Te Ahu a Turanga as the resilient replacement of a previous corridor. The RTC expressed concern that tolling this route would contradict the information and advice contained within the GPS 2024.
- They shared concerns that tolls are set too high for both light vehicles and freight operators, with potential downstream effects on business, consumers and the general economy
- Tolls may drive traffic onto alternative, less suitable routes such as the Saddle Road or Pahiatua Track, increasing the need for maintenance and potentially exacerbating safety concerns.
- They noted the road between Palmerston North and Woodville is a critical western gateway to Hawke's Bay, particularly for freight and fresh produce, and is a key connecting corridor for Napier Port - both for imports and exports. Increased costs for freight could make alternative freight corridors (e.g. north to Tauranga or Auckland) comparatively less expensive to use, which would likely divert freight flows away from this crucial connection. This would negatively impact regional trade, growth, high value exports, and the competitiveness of the region's businesses reliant on efficient transportation.
- They highlight the potential health implications for residents in their region who travel to Palmerston North for specialised healthcare
- They ask that NZTA assess potential alternatives to tolling that may better serve the community and the region's long-term economic and social wellbeing.

Iwi /hapu

Stakeholder Name	Sentiment
s 9(2)(ba)(i)	Do not support
<ul style="list-style-type: none"> • Understand that Te Ahu a Turanga is a replacement road for State Highway 2, in response to the closure of the Manawātū Gorge. Communication was wide and open for public scrutiny. Most importantly partnerships were forged between Iwi, Councils, He Waka Kotahi NZTA, and those building the road. Tolling was never discussed or written into the planning • Tolling of the replacement road was publicly announced in August 2024 without consultation and has been deemed as a new road which it is not. • The replacement road is essential for the health, social, economic and cultural wellbeing of all those living immediately on both sides of the Ruahine Range and wider. • Tolling the road will literally drive use of the alternative routes because the toll pricing is prohibitive 	

Stakeholder Name	Sentiment
s 9(2)(ba)(i)	Do not support
<p>This is an area of significant cultural importance, and s 9(2)(ba)(i) strongly oppose the toll. At no point has a toll ever been discussed with Rangitāne.</p> <ul style="list-style-type: none"> • s 9(2)(ba)(i) view Te Ahu a Turanga: Manawātū Tararua Highway as a replacement road, a critical link for communities – the primary connector between the eastern and western regions. From inception, it was designed and planned to provide a more affordable, safer and efficient transport link for people and goods. Placing a toll on the road will drive significant numbers to the alternate routes, meaning these goals will no longer be achieved. • This is an area of high deprivation. The social and economic impacts on whānau and community (access to healthcare, daily commuting) are unacceptable, and totally unfair. <ul style="list-style-type: none"> - Palmerston North is the primary hospital for the region and it's crucial to have safe and reliable access - The daily commuting costs unfairly target low-income workers. Many people travel out of the region for work, school (including university) and sport opportunities, the toll creates barriers and stress on families. 	

- The alternative routes are not adequate, they are farm roads, and not designed for long-term use. They are not built to cater to the traffic numbers or load, and it is not possible to bring them up to be safe.
 - Further to this, s 9(2)(ba)(i) are concerned with how NZTA is “seemingly sidelining the real issues and concerns about the potential of continued high traffic use of the Saddle and Pahiatua Track” should the tolling go ahead.
 - s 9(2)(ba)(i) do not believe it is possible on funding available for Tararua District Council to bring these roads up to the safety standards required.
- s 9(2)(ba)(i) disagree with the tolling assessment that determined the road met the legislative requirements for tolling and that the revenue would contribute in a meaningful way to the maintenance and operations and construction costs of the road
- When in the early stages of development, Te Ahu a Turanga: Manawatū Tararua Highway was favoured due to maintaining connection to the closed Manawatū Gorge SH3 route and various areas of cultural significance in and around the Manawatū Gorge, Ruahine and Tararua ranges.
- s 9(2)(ba)(i) strongly highlighted the cultural significance of the Te Apiti landscape to understand their deep relationship with the Te Ahu a Turanga – Manawatū Tararua Highway location and opposition to the proposed tolling
 - There are several significant sites and/or key features of the landscape for s 9(2)(ba)(i) (see full submission)
 - Noted how they “seek to vigorously protect the few remaining resources within our takiwā that we have some input in. The destruction of our food basket, the loss of our Huia and the subsequent alienation of almost all our lands continue to have a detrimental effect on our cultural identity and mana.”
 - Noted the conservation elements of the area, and its importance for future generations
 - They make special mention of the name of the roading project and that it was gifted.
 - The s 9(2)(ba)(i) aspiration and intent for this road was to maintain the connection to the old Manawatū Gorge Road, their pae maunga (Ruahine and Tararua Ranges) and Te Awa Pokere o Tamakuku (Eastern Manawatū River). They feel this is absolutely fundamental to their identity.
 - Additionally, the Te Ahu a Turanga Highway Project offered an opportunity for s 9(2)(ba)(i) to build upon their relationship with Te Apiti, the Ruahine ranges and their taonga, a potential to restore a missing piece of culture for s 9(2)(ba)(i)
- s 9(2)(ba)(i) would like to acknowledge the leadership NZTA has shown and the genuine attempt to work with iwi as real partners from the inception of the works around the Manawatū Gorge SH3 closure and the planning and construction of Te Ahu a Turanga Road. However, they feel that this has been sidelined with regards to the proposed tolling.
- The tolls are among the highest in the country.
 - Additionally, the short turnaround of paying the toll was highlighted (5 days)
- s 9(2)(ba)(i) strongly note the following:
 - “Had we known that tolling was a potential from the beginning this option would not have been supported or allowed. We would not have agreed to the placement of any bridge piers in the boundary of Parahaki Island or the Manawatū Awa, and we would NOT have offered up our tūpuna name for this section of the SH3 highway.”
 - “We cannot toll our s 9(2)(ba)(i) whānau on an ara/route of their tūpuna, and/or sites of such high significance. To Toll this road, you will be trampling on the mana of our tūpuna and the mana of our people. To charge our s 9(2)(ba)(i) people for something they have a right and interest in is disgraceful and unacceptable.”
 - “The government has a responsibility to provide a new safe, reliable and resilient replacement road, to charge us for this is disgraceful and unacceptable.”

To conclude, they request time for two speakers to address the content of the submission.

Stakeholder Name	Sentiment
s 9(2)(ba)(i)	Do not support
This is an area of significant cultural importance, and the s 9(2)(ba)(i) (referred to as "The Trust" for this submission).	
Strongly oppose the toll. At no point has a toll ever been discussed with Rūnanga or The Trust.	
<ul style="list-style-type: none"> • The trust view Te Ahu a Turanga: Manawatū Tararua Highway as a replacement road, a critical link for communities - the primary connector between the eastern and western regions. From inception, it was designed and planned to provide a more affordable, safer and efficient transport link for people and goods. Placing a toll on the road will drive significant numbers to the alternate routes, meaning these goals will no longer be achieved. • This is an area of high deprivation. The social and economic impacts on whānau and community (access to healthcare, daily commuting) are unacceptable, and totally unfair. - Palmerston North is the primary hospital for the region and it's crucial to have safe and reliable access 	

<ul style="list-style-type: none"> - The daily commuting costs unfairly target low-income workers. Many people travel out of the region for work, school (including university) and sport opportunities, the toll creates barriers and stress on families. 	
<ul style="list-style-type: none"> • The alternative routes are not adequate, they are farm roads, and not designed for long-term use. They are not built to cater to the traffic numbers or load, and it is not possible to bring them up to be safe. <ul style="list-style-type: none"> - Further to this, The Trust are concerned with how NZTA is "seemingly sidelining the real issues and concerns about the potential of continued high traffic use of the Saddle and Pahiatua Track" should the tolling go ahead. - The Trust do not believe it is possible on funding available for Tararua District Council to bring these roads up to the safety standards required. 	
<ul style="list-style-type: none"> • The Trust disagree with the tolling assessment that determined the road met the legislative requirements for tolling and that the revenue would contribute in a meaningful way to the maintenance and operations and construction costs of the road 	
<ul style="list-style-type: none"> • When in the early stages of development, Te Ahu a Turanga: Manawatū Tararua Highway was favoured due to maintaining connection to the closed Manawatū Gorge SH3 route and various areas of cultural significance in and around the Manawatū Gorge, Ruahine and Tararua ranges. 	
<ul style="list-style-type: none"> • The Trust strongly highlighted the cultural significance of the Te Apiti landscape to understand their deep relationship with the Te Ahu a Turanga - Manawatū Tararua Highway location and opposition to the proposed tolling <ul style="list-style-type: none"> - There are several significant sites and/or key features of the landscape for s 9(2)(ba)(i) (see full submission) - Noted how they "seek to vigorously protect the few remaining resources within our takiwā that we have some input in. The destruction of our food basket, the loss of our Huia and the subsequent alienation of almost all of our lands continue to have a detrimental effect on our cultural identity and mana." - Noted the conservation elements of the area, and its importance for future generations - They make special mention of the name of the roading project and that it was gifted. - The s 9(2)(ba)(i) aspiration and intent for this road was to maintain the connection to the old Manawatū Gorge Road, their pae maunga (Ruahine and Tararua Ranges) and Te Awa Pokere o Tamakuku (Eastern Manawatū River). They feel this is absolutely fundamental to their identity. - Additionally, the Te Ahu a Turanga Highway Project offered an opportunity for s 9(2)(ba)(i) to build upon their relationship with Te Apiti, the Ruahine ranges and their taonga, a potential to restore a missing piece of culture. 	
<ul style="list-style-type: none"> • The Trust would like to acknowledge the leadership NZTA has shown and the genuine attempt to work with iwi as real partners from the inception of the works around the Manawatū Gorge SH3 closure and the planning and construction of Te Ahu a Turanga Road. However, they feel that this has been sidelined with regards to the proposed tolling. 	
<ul style="list-style-type: none"> • The tolls are among the highest in the country. <ul style="list-style-type: none"> - Additionally, the short turnaround of paying the toll was highlighted (5 days) 	
<ul style="list-style-type: none"> • The Trust strongly note the following: <ul style="list-style-type: none"> - "Had we known that tolling was a potential from the beginning this option would not have been supported or allowed which includes a pier in our tūpuna awa (Manawatū) and in the boundary of Parahaki Island. Nor would our Tūpuna name have been given for the road." - "We cannot toll our s 9(2)(ba)(i) whānau on an ara/route of their tūpuna, and/or sites of such high significance. To Toll this road, you will be trampling on the mana of our tūpuna and the mana of our people. To charge our s 9(2)(ba)(i) people for something they have a right and interest in is disgraceful and unacceptable." - "The government has a responsibility to provide a new safe, reliable and resilient replacement road, to charge us for this is disgraceful and unacceptable." 	
<p>To conclude, they request time for two speakers to address the content of the submission.</p>	

Stakeholder Name	Sentiment
s 9(2)(ba)(i)	Do not support
<ul style="list-style-type: none"> • Te Ahu a Turanga: Manawatū Tararua Highway designed to deliver long term outcomes for community and environment – "tolling flies in the face of many years of partnership and mahi" - undermining the planned outcomes of efficient connection (reduced travel times) and enhanced traffic environment (from less traffic on the alts) • Feel that tolling is a significant breach of te Tiriti o Waitangi • Commented that it is inequitable, with affordability driving many users to the alternative routes – negatively impacting both the environment (road discharge + stormwater) the communities (increased risk, barriers to services) and economy (reduced visitor volume, negative business impacts). • Highlighted that both councils cannot afford the likely additional maintenance required for the alternative routes • Inhibiting cultural connection is a key factor to consider – and additionally are concerned with commercialising mahi toi. "This intellectual property the Crown does not have any ownership of." 	

Stakeholder Name	Sentiment
s 9(2)(ba)(i)	Do not support
<p>The trust represents 266 beneficial owners of Parahaki Island on which the replacement highway is sited.</p> <p>And strongly oppose the proposed tolls noting the wāhi tapu nature of the land that highway has been built upon.</p> <ul style="list-style-type: none"> There has been ongoing damage to culturally significant land due to the bridge construction The Trust allowed the replacement road project to proceed only after being assured that in building the replacement highway the best interests of the public was their number one priority There was no indication at any point up to now of a proposal to toll the replacement highway. If they had been informed during 2020 negotiations of any possibility of tolling, we would have not given consent to the option chosen that crosses Parahaki Island and the desecration of the resting place of their tupuna. The Trustees feel duped in the process. <p>In closing, they shared that If the tolling proposal is endorsed by the board and the board ignores the widespread opposition, the Trust will consider all options. "Those options will be legal, peaceful but relentless."</p>	

Stakeholder Name	Sentiment
s 9(2)(ba)(i)	Do not support
No further feedback was shared.	

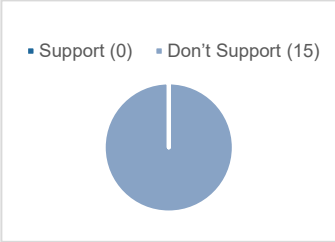
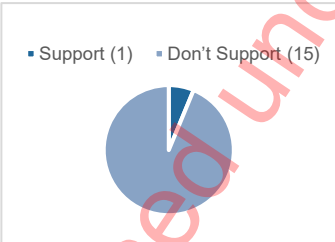
Stakeholder Name	Sentiment
s 9(2)(ba)(i)	Do not support
<p>Submit in opposition to the proposed tolling on the Ō2NL and Te Ahu a Turanga projects.</p> <p>While infrastructure development is crucial, the tolling model as currently proposed would impose unnecessary financial, social, cultural, and environmental burdens on communities, particularly Māori, and does not align with principles of partnership and equity under Te Tiriti o Waitangi.</p> <p>The following areas of concern are addressed in the submission:</p> <ul style="list-style-type: none"> Economic burdens on communities and small businesses Impacts from traffic diversion and local infrastructure strain The viability of the cost of toll infrastructure and economic inefficiency Impact on Māori cultural and sacred sites by restricting access. Growing economic disparities and the risk of inequity. Community displacement and disruption of Māori ways of life. The need for true partnership and Inclusive consultation. 	

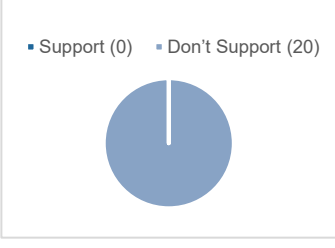
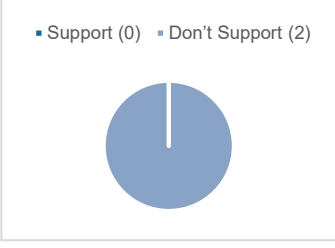
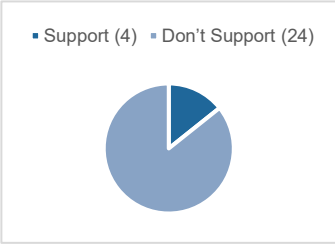
Stakeholder Name	Sentiment
s 9(2)(ba)(i)	Do not support
<ul style="list-style-type: none"> To date there has been no direct consultation with iwi partners on the proposed tolls Concerned that essential clinical services will be harder to access Mentioned that this is a replacement road not a new road Highlighted that the Fast-tracking bill has just been legislated Rates will continue to increase in Tararua due to the ongoing upkeep of the Saddle Road and Pahiatua Track Felt that tolled roads should only go to the road costs (recognising that costs were pre considered) 	

Emergency services

Stakeholder Name	Sentiment
s 9(2)(ba)(i) St John s 9(2)(ba)(i)	Do not support
<p>s 9(2)(ba)(i)</p> <ul style="list-style-type: none"> s 9(2)(ba)(i) Highlighted this is a replacement road as NZTA closed the old road. Mentioned rural communities are already disadvantaged by lack of government funding for basic services such as health care, additionally recognising the economic impact on the rural community They ask: "Why was the Waikato Highway not tolled? Transmission Gully? This replacement road is being targeted because it is easy to place a toll on" Feel that the road is already paid for. 	

Other submissions received

Organisation type	Organisation represented
Education Providers  <p>Support (0) Don't Support (15)</p>	Ruahine School, Dannevirke High School, Woodville School, Tararua REAP, Tararua College, Pahiatua School, Massey University, Building Blocks, Massey University, Pahiatua School Board of Trustees, Norsewood & Districts School, UCOL (Education Provider), Huia Range School, Kumeroa School, Mangatainoka School
Business Chambers and Economic Development authority  <p>Support (0) Don't Support (3)</p>	Manawatū Business Chamber, Central Economic Development Agency, Dannevirke Chamber of Commerce
Community organisations & church organisations  <p>Support (1) Don't Support (15)</p>	Dannevirke Host Lions Club, Pahiatua Community Vehicle Trust, Kelvin Grove Community Association, Dannevirke Community Board, New Zealand Motor Caravan Association, City to Sea Rail Trial – Manawatu, Whatunga Tūao Volunteer Central, THINK Hauora, Te Pū Harakeke, Local Markets NZ, Eketāhuna Community Board, Woodville Lions Club, Eat Up New Zealand Trust, Positively Woodville, St Peter's Anglican Church, Holy Trinity Anglican Church Woodville

Organisation type	Organisation represented
Healthcare providers 	Woodville Medicine Depot, Tararua Health Group, RGrantMD Medical Consulting Ltd, Dannevirke Community Hospital, Te Pae Oranga o Ruahine o Tararua Iwi Māori Partnership Board, Health For Life Wellington Ltd, Health hub project New Zealand, Arohanui Hospice, Te kete hauora o Rangitāne, Nelson Residential Care Centre, Sydney Street Health Centre, Te Whatu Ora/HealthNZ Midcentral, Supported Lifestyles Services, Alzheimers Society Manawatu, Te Kete Hauora o Rangitane. Rapid Response Dental Manawatu Centre, Cancer Society NZ Inc, Cancer Society Hawke's Bay, Cancer Society Manawatu
Community media organisations 	Radio Woodville 99.6FM, Coffee News Manawatu/Tararua
Transport and logistics businesses 	He's Wright Limited, Beale Trucking Ltd, Macdonald Contracting Limited, Robert Holmes, Fliway transport, Tanner Contracting Ltd, Saholma Roadhaul Ltd, Lift Haulage Ltd, Withers Coachlines, Urgent Cool Logistics Ltd, Skg trucking ltd, Satnam trucking ltd, BHL, Tim Coombs Deer and Stock Transport, Tararua logistics ltd, Bourke Haulage, Ute Express, Greig Cartage, Graham transport ltd, Ellison Cartage Ltd, Harrison Transport Ltd, D & J Fitzgerald Transport Ltd, Helenbak Haulage, Reisima Haulage Ltd, A.S. & R.A. Appleton J.P. Ware Transport Ltd, Horton transport Ltd, Thomas Haulage Limited, National Road Carriers Tranzit Group