



TE AHU A TURANGA: MANAWATŪ TARARUA HIGHWAY TOLLING PROPOSAL

Consultation summary report

1 November 2024

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Contents

Copyright information	2
Disclaimer	2
More information	2
EXECUTIVE SUMMARY	4
1. BACKGROUND AND PURPOSE	6
2. CONSULTATION FEEDBACK SOUGHT	7
2.1 Activities to raise awareness	7
3. SUMMARY OF FEEDBACK	8
3.1 Number of submissions	8
3.2 Who we heard from	8
3.3 Overall sentiment for Te Ahu a Turanga: Manawatū Tararua Highway tolling	9
3.4 Sentiment by submitter interest category	11
3.5 Key feedback themes	11
3.6 About our submitters	13
4. SUMMARY OF PARTNER AND STAKEHOLDER FEEDBACK	15
4.1 Iwi/ hapū	15
4.2 Local authorities	17
4.3 Land transport users and providers	22
4.4 Infrastructure organisations	24
4.5 Critical Healthcare organisations	24
5. NEXT STEPS	25

Executive summary

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

Road Controlling Authorities (RCAs) 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. In making a recommendation to the Governor-General, the LTMA requires that, amongst other considerations, the Minister 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.

The purpose of this document is to assist in the consideration of the adequacy of consultation and level of support for a proposed tolling scheme for State Highway 3 Te Ahu a Turanga: Manawatū Tararua Highway (SH3 Te Ahu a Turanga).

To be effective, public consultation on the proposal to toll Te Ahu a Turanga: Manawatū Tararua Highway ran from Monday 9 September 2024 to Monday 7 October 2024, and involved a combination of the following:

- Online consultation form
- A plain-English hard copy document explaining the tolling scheme
- An advertising strategy that ensured that communities were aware of the proposal, timing and could provide input.

We received a total of 12,076 responses from the public and a range of key stakeholders. The feedback told us:

9% of respondents support tolling Te Ahu a Turanga: Manawatū Tararua Highway

- 3% (378 people) support the proposed tolling
- 6% (743 people) support the proposed tolling but suggest some changes.

90% of respondents do not support tolling Te Ahu a Turanga: Manawatū Tararua Highway

- 76% (9,148 people) told us they do not support tolling for this road
- 14% (1,739 people) do not support tolling of any roads.

1% of respondents (68 people) were unsure about the proposal

People who support and do not support the tolling proposal shared similar suggestions in their feedback. Across the feedback we found:

2,602 (22%) people felt the proposed price should be cheaper

1,545 (13%) feel the proposed pricing is too high for commuters and regular users.

443 (4%) people also felt the toll was high when compared to other toll rates in New Zealand.

	1,578 (16%) people shared thoughts on other pricing options, such as concessions, exemptions, and aligning toll pricing throughout NZ.
3,653 (30%) people felt Te Ahu a Turanga: Manawatū Tararua Highway is a replacement road	<p>3,653 (30%) believe Te Ahu a Turanga: Manawatū Tararua Highway is a like-for-like replacement for the defunct SH3 Manawatū Gorge Road and on this basis should not be subject to tolling.</p> <p>143 people (1%) feel Te Ahu a Turanga: Manawatū Tararua Highway does not meet the criteria for tolling as outlined in the tolling assessment for other reasons such as predicted car volumes.</p>
2,370 people (20%) shared concerns about the alternative routes.	Some people have concerns that alternate routes are often closed, are dangerous, and will deteriorate further with tolling imposed. 1,072 (9%) people shared concerns about increased maintenance required and how this will be managed.

1,578 suggestions were shared by respondents about what kind of tolling they would support. The main themes include:

- Reducing the toll rates by half or matching the price point of other toll roads in New Zealand.
- Reduce rates to \$2 or below each way.
- Concessions for frequent users including on/off peak options, discounted rates for residents, pensioners, and students (including those in tertiary education).
- Free for healthcare providers such as the Hato Hone St John's Healthcare shuttle and Cancer Society transport volunteers.
- Toll heavy users a greater amount.
- Extending tolling to cycleway and walkway users.

1. Background and purpose

State Highway 3 through the Manawatū Gorge was closed indefinitely on 24 April 2017 following a large slip. There was 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 100km/h design speed and 2 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) 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.

Road Controlling Authorities (RCAs) 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, the Minister of Transport may wish to consult with Cabinet colleagues before making such a recommendation.

In making a recommendation to the Governor-General, the LTMA requires that the Minister of Transport 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.

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

The purpose of this document is to assist in the consideration of the adequacy of consultation and level of support for a proposed tolling scheme for State Highway 3 Te Ahu a Turanga: Manawatū Tararua Highway (SH3 Te Ahu a Turanga).

2. Consultation feedback sought

From Monday 9 September 2024 to Monday 7 October 2024, NZTA sought public feedback on the proposal to toll Te Ahu a Turanga: Manawatū Tararua Highway.

The proposal in this consultation included the proposed toll rates of \$4.30 per trip for light vehicles and \$8.60 per trip for heavy vehicles (2024 dollars subject to factors including CPI increases). The rates were proposed to remain the same both on and off peak times. The proposal for the new highway included 2 points of access, from Ashhurst in the west and Woodville in the east.

The public could give feedback on the proposal via our online survey, using our freepost hard copy feedback form, or requesting a form by emailing the project team at teahuaturanga@nzta.govt.nz

The Te Ahu a Turanga: Manawatū Tararua Highway tolling webpage and consultation brochure can be found [here](#).

2.1 Activities to raise awareness

To be effective, public consultation ran for 4 weeks, and involved a combination of the following:

- Online consultation form
- A plain-English hard copy document explaining the tolling scheme
- An advertising strategy that ensured that communities were aware of the proposal, timing and could provide input.

The following consultation activities were carried out to raise awareness and seek feedback on the tolling proposal:

- NZTA media release.
- Tolling consultation webpage on the NZTA website.
- Delivered 5,450 consultation postcards to households adjacent to the highway including Ashhurst and Woodville.
- Made 3,600 consultation brochures with submission form available from City, District and Regional council offices and libraries in Palmerston North, Dannevirke, Woodville, Pahiatua, Feilding.
- Promoted consultation in 2 Te Ahu a Turanga project email newsletters, to 1,930+ subscribers.
- Emailed Te Ahu a Turanga Project Community Liaison members and community stakeholders, 100+ (includes local residents, council staff, recreational groups, road user groups, emergency services).
- Promoted social media posts across on NZTA Manawatū-Whanganui Facebook page (total reach 118k).
- 4 weeks of digital advertising targeting Tararua District, Palmerston North, Manawatū District, Central Hawke's Bay, Whanganui, Kāpiti.
- 2 weeks of radio advertising targeting Tararua District, Palmerston North, Manawatū District, Central Hawke's Bay, Whanganui, Wairarapa, Kāpiti, Horowhenua.
- Print advertising in Manawatū Standard, Hawke's Bay Today, Whanganui Chronicle, Bush Telegraph, The Post, Rangitikei-Feilding Herald, Wairarapa Times Age.

3. Summary of feedback

3.1 Number of submissions

We received a total of 12,076 submissions on this proposal consisting of 11,974 submissions from the public and 22 submissions from key stakeholder groups.

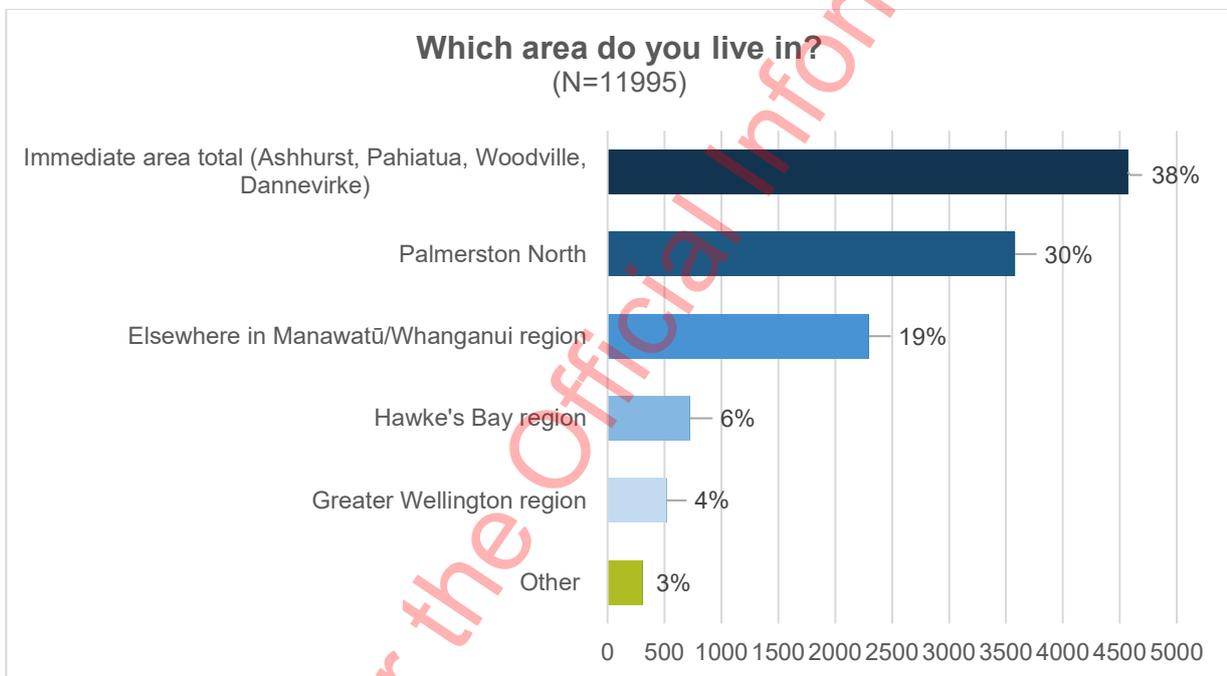
Of the submissions received, 11,459 were completed using the online feedback form and 65 were emailed to us, and 552 hard copy forms were received.

Feedback received from key stakeholder groups including Local Authorities, land transport user organisations and iwi / hapū is included on the overall analysis and is summarised [here](#).

3.2 Who we heard from

Most people we heard from lived locally (4,571 respondents, 38%), with a further 30% indicating they live in Palmerston North and 19% elsewhere in the Manawatū/Whanganui region.

6% of respondents told us they live in Hawke's Bay 6%, and 4% in the Greater Wellington region. The remaining 3% live throughout other regions in New Zealand and offshore.



11,995 submitters told us where they live.

Figure 1 – Areas where submitters live

3.3 Overall sentiment for Te Ahu a Turanga: Manawatū Tararua Highway tolling

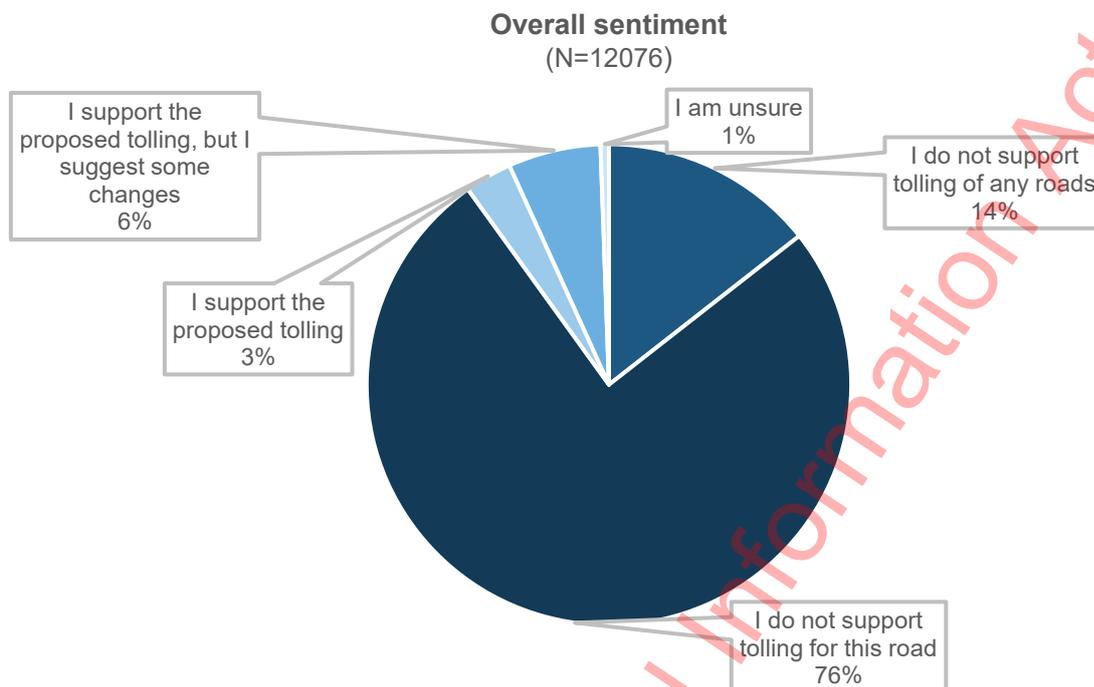


Figure 2 – Overall sentiment

3% (378 people) told us they support the tolling of Te Ahu a Turanga: Manawatū Tararua Highway

Key reasons in support for tolling included:

- They support a ‘user pays’ approach.
- “If we want good quality roads, we need to pay for them”.
- It provides opportunities for greater reinvestment into roading infrastructure.
- Tolling will support funding being available for maintenance and improvements to the road.

We need to be able to fund large infrastructure projects quickly, and a partially user pays system is a good way towards making more capital available for improved infrastructure.

Tolling helps build the new high-quality roads we need and there is an alternative route over the saddle road for those who do not wish to pay.

Tolling ensures that there is sufficient funding for other roading projects/upgrades and importantly maintenance.

6% (743 people) told us they support tolling, with some changes to the proposal

The most common conditions of support for tolling Te Ahu a Turanga: Manawatū Tararua Highway tolling include:

- A reduction in price of the toll (no price point given).
- Keeping the pricing consistent with other toll roads throughout New Zealand.
- Reducing the price by half / \$2.50 to \$2 for cars.
- Provide concession options for frequent users including on/off peak discounts, discounted rates for residents, pensioners, and students (including those in tertiary education).

- Ensure the toll road is free for Hato Hone St John's Healthcare shuttle, Cancer Society transport and other volunteer organisations transporting people from throughout the regions to and from Palmerston North hospital for critical care. Noting the burden tolls will have on not-for-profits and challenges with the alternate routes (hard to drive, often closed).
- A standalone toll or higher rate for heavy users, reflecting their increased impact on the road.
- Consider tolling cyclists and pedestrians for use of Te Ahu a Turanga: Manawatū Tararua Highway shared path facility.

I think it should be tolled for the length of time required to pay it off. However, \$4.80 is pretty steep for one way travel. Especially for people who have to travel both ways, 5 times a week

There should be a third, higher rate for very heavy vehicles and a way for regular local users to receive significant discounts, with light vehicles receiving the biggest discounts

The tolls up north cost half this amount

90% of those we heard from have concerns about the tolling, including whether it is appropriate to toll this road, and the impact tolling will have on their community

People felt that:

- Te Ahu a Turanga: Manawatū Tararua Highway is a like for like replacement of the Manawatū Gorge route closed due to flooding and storm damage.
- The impacts a toll will have in a lower-than-average income area, exacerbated by the current high costs of living.
- It is unfair to introduce the idea of tolling due to how long the project has been planned and in development for.
- The ongoing quality and safety of the alternative routes.
- The ongoing impacts on locals who will be unable to afford the toll and for the region.
- Going ahead with tolling risks eroding the enormous goodwill that NZTA, the community and iwi have built together throughout the design, consenting and build of this important highway.

Pahiatua residents median wage is under \$30k per year to put this toll into perspective, after tax this toll is 10% of a median wage.

This is a replacement road that is years too late in completion. If it was a new road that was signalled as being tolled from the word 'go', that would be different (e.g. Te Puke bypass).

This proposal for tolling is being considered when the project is almost complete. This is a significant change to what was previously agreed to.

3.4 Sentiment by submitter interest category

The table below details the number of submissions received from key stakeholders and the public.

Table 1 – Public and stakeholder sentiment for the proposed toll by interest category

Category	Total	Support	Conditional Support	Oppose / concerned	Unsure/No Response
Local authorities	8	1		7	-
Land transport organisations providers	4	1	-	3	-
Infrastructure organisation	1	1	-	-	-
Iwi / hapū	8	-	-	8	-
Critical Healthcare services	1	-	-	1	-
Public	11,974	374	739	10,793	68
Business, residents and ratepayers' associations	3	-		3	-
Transport and logistics	29	1	3	25	-
Education providers	13	-	-	13	-
Community & church organisations	15	-	1	14	
Healthcare providers	18			18	-

3.5 Key feedback themes

The table below is a summary of key feedback themes and suggestions made. Themes are grouped by sentiment toward the overall proposal and aspects of the proposed tolls for Te Ahu a Turanga: Manawatū Tararua Highway.

Table 2 – Key feedback themes

Support tolling this road (3%)
<ul style="list-style-type: none"> • Support the principle of 'user pays' as a fair way to pay for necessary roading projects. • Believe that "If we want good quality roads, we need to pay for them". • See tolling as an opportunity for greater reinvestment into roading infrastructure overall. • Think tolling is fair as a free alternative route is available. • Like that tolling can support recouping costs and ringfences funds for repairs and maintenance.
Changes suggested as a condition of support for tolling (6%)
Toll prices overall
<ul style="list-style-type: none"> • While the majority of those who support felt the costs at the proposed price point (Light vehicles \$4.30 Heavy vehicles (Over 3500kg gross vehicle mass) \$8.60) is too high (418 respondents 3.5%) and would reduce potential revenue - submitters suggested different solutions to mitigate this within the community. • Align pricing with other toll roads in New Zealand, noting the lower proposed pricing for Ōtaki to north of Levin highway and Takitimu North Link. • "Half the price" / \$2.50.

- Suggest reducing tolls for cars to \$3, \$2 and below.

Concessions

- Encourage regular use of the road by providing multi-trip concessions for commuters and daily users such as students and community services card holders.
- Consider daily price cap for those travelling back and forth several times a day.
- Create resident / rate payer concessions to help support moving locals from the alternative routes that are considered inadequate by some submitters.

Toll mechanism and use of funds

- Be transparent about how and where the Te Ahu a Turanga: Manawatū Tararua Highway funds are used, ringfencing funds to support road maintenance and upgrades in the region.
- Provide an end date for the tolling of Te Ahu a Turanga: Manawatū Tararua Highway.

Different road users

- Ensure the toll road is free for St John's Healthcare shuttle, Cancer Society transport and other volunteer organisations transporting people from throughout the regions to and from Palmerston North hospital for critical care. Noting the burden tolls will have on not-for-profits and challenges with the alternate routes (hard to drive, often closed).
- Consider a standalone toll or higher rate for heavy users, reflecting their increased impact on the road.
- Consider tolling cyclists and pedestrians for use of Te Ahu a Turanga: Manawatū Tararua Highway shared path facility.

Concerns raised about the proposed tolling (90%)

Perception of the road and its value to the community

- Strongly feel that Te Ahu a Turanga: Manawatū Tararua Highway is replacing SH3 Manawatū Gorge Road.
- That it is a vital connector between regions, and therefore should not be tolled.
- Frustrated "we've paid the price" sentiment, highlighting the social and economic impact on the region since the SH3 Manawatū Gorge Road closure.

Fairness and process

- With tolling proposed close to the road opening, it is unfair to implement at this late stage.
- Going ahead with tolling risks eroding the goodwill towards the highway from local communities and iwi.
- Iwi / hapū oppose the toll with concerns relating to the importance of cultural connection for Māori and the tolls impacting on access to places of significance and feel lack of engagement in the process.

Financial implications

- Tolling presents an unfair financial burden within the current "cost of living" environment and is perceived as inequitable.
- Direct fiscal impacts on commuters and regular users, reducing take home pay if they were to use the toll road regularly.
- Roads are paid through Road User Charges / fuel tax / rates (effectively we are 'paying twice').
- Tolling will further impact economic growth potential for the region.

Negating benefits

- Tolling will discourage people from using Te Ahu a Turanga: Manawatū Tararua Highway, negating the previously indicated benefits of the new road (safe, efficient, reconnect communities, positive economic impacts).
- Tolling will drive cost-sensitive road users to the alternatives, which they considered unsuitable, unsafe and likely to deteriorate further.

Alternative route maintenance

- Potentially significant maintenance costs arising from alternative roads returning to District Council jurisdiction, and corresponding increases in rates.

Criteria for tolling not being met

- Te Ahu a Turanga: Manawatū Tararua Highway does not meet NZTA tolling assessment criteria, particularly with regards to predicted traffic volumes and that the road is a like for like replacement of the closed SH3 Manawatū Gorge Road.

3.6 About our submitters

We asked people to tell us what their interest in this project is and how they plan to use Te Ahu a Turanga: Manawatū Tararua Highway. Those who completed our online survey or freepost form could select one or more of the options provided to describe their interest/s. Some respondents chose not to respond to these questions.

Respondents shared that their main **interest** in the area is to travel and commute regularly (6,984 respondents), visit friends (4,624 respondents), or for recreation (3,731 respondents). 2,036 respondents also highlighted they live along or near Te Ahu a Turanga.

Of the 12,076 submissions, only 148 felt they had no link to the area – do not work, live or visit friends and family there; and would not use the road. Of these 148, 5% were in support of tolling and 95% not in support.

Table 3 – Interest in the Te Ahu a Turanga: Manawatū Tararua Highway

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	2,036	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%

Base: Responses to question (11,984 responses). People could select more than one response

Table 4 – How people plan to use Te Ahu a Turanga: Manawatū Tararua Highway

Response	Count	% of responses
I will not use if it is tolled	6,040	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)	907	6%

Base: Responses to question (11,983 responses). People could select more than one response.

Released under the Official Information Act 1982

4. Summary of partner and stakeholder feedback

We have summarised written submissions from iwi/hapū and key stakeholder groups. Themes from their feedback are also included in the overall feedback themes and sentiment summaries earlier in this report.

Many submissions are detailed and we have summarised the information into key themes. Full submissions are available to the Minister on request. As tolling is a matter under active consideration, stakeholder submissions will only be considered for release once a final decision is made.

4.1 Iwi/ hapū

s 9(2)(ba)(i)	Do not support tolling this road
<ul style="list-style-type: none">• Consider Te Ahu a Turanga is a replacement road for in response to the closure of the Manawatū Gorge Road.• Tolling was never discussed or written into the planning at any stage of the process and through the important partnerships that were forged between Iwi, Councils, He Waka Kotahi NZTA, and those building the road.• 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 area.• Tolling the road drive use of the alternative routes because the toll pricing is prohibitive.	

s 9(2)(ba)(i)	Do not support tolling this road
<p>Oppose the proposed tolling for the following reason:</p> <ul style="list-style-type: none">• At no point has a toll ever been discussed with Rūnanga or The Trust.• The trust views the 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 and the social and economic impacts on whānau and community (access to primary healthcare facilities, daily commuting) will be high.• The alternative routes are not adequate, being farm roads and not designed for long high use. Funding will also be problematic for Tararua District Council to bring these roads up to standard.• 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.• When in the early stages of development, the route was favoured due to maintaining connection to the closed Manawatū Gorge SH3 and various areas of cultural significance in and around the Manawatū Gorge, Ruahine and Tararua ranges.• 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 and its impact on and limiting access to cultural sites.• The Trust acknowledge the leadership NZTA has shown and the genuine attempt to work with iwi as real partners from the inception of the works, however, they feel that this has been sidelined with the proposed tolling.• The proposed tolls are among the highest in the country.	

s 9(2)(ba)(i)

Do not support tolling this road

Oppose the proposed tolling for the following reason:

- At no point has a toll ever been discussed with Rūnanga or The Trust.
- The trust views the 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 and the social and economic impacts on whānau and community (access to primary healthcare facilities, daily commuting) will be high.
- The alternative routes are not adequate, being farm roads and not designed for long high use. Funding will also be problematic for Tararua District Council to bring these roads up to standard.
- 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.
- When in the early stages of development, the route was favoured due to maintaining connection to the closed Manawatū Gorge SH3 and various areas of cultural significance in and around the Manawatū Gorge, Ruahine and Tararua ranges.
- 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 and its impact on and limiting access to cultural sites.
- The Trust acknowledge the leadership NZTA has shown and the genuine attempt to work with iwi as real partners from the inception of the works, however, they feel that this has been sidelined with the proposed tolling.
- The proposed tolls are among the highest in the country.

s 9(2)(ba)(i)

Do not support tolling this road

- Te Ahu a Turanga: Manawatū Tararua Highway is designed to deliver long term outcomes for the community and environment, of which tolling will undermine.
- Tolling is a significant breach of Te Tiriti o Waitangi, and breach of trust locally with tolling not being raised at the outset.
- 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).
- Local councils cannot afford the likely additional maintenance required for the alternative routes.
- Tolling will inhibit cultural connection to the land and commercialises mahi toi along the route.

s 9(2)(ba)(i)

Do not support tolling this road

The Trust opposes the proposed tolling noting:

- The wāhi tapu nature of the land that highway has been built upon.
- The 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 in the best interests of the public.
- There was no indication at any point to toll the replacement highway, and had they been informed they would have not given consent to the option chosen crossing Parahaki Island and the desecration of the resting place of their tupuna.
- The Trustees feel duped in the process.

In closing, the Trust shared that if the tolling proposal is endorsed, ignoring widespread opposition, they will consider all options.

s 9(2)(ba)(i)

Do not support tolling this road

Submit in opposition to the proposed tolling:

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.

The following areas of concern are addressed in the submission:

- 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.

s 9(2)(ba)(i)

Do not support tolling this road

Oppose the tolling for the following reasons:

- To date there has been no direct consultation with iwi partners on the proposed tolls.
- This is a replacement road not a new road.
- Essential clinical services will be harder to access.
- Rates will continue to increase to cover the ongoing upkeep of the Saddle Road and Pahiatua Track.
- Felt that toll revenue should go back into the road costs only (recognising that costs were pre considered).

4.2 Local authorities

Tararua District Council (TDC)

Do not support tolling this road

TDC do not support any tolling of the Te Ahu a Turanga: Manawatū Tararua Highway. They are very concerned tolling was never discussed throughout land acquisition and consenting processes, which would have led to different conversations, particularly with iwi.

TDC do not consider this road meets NZTA's criteria for its own Tolling Policy and note they have received requests 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.

While TDC 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 the district.

TDC do not believe Te Ahu a Turanga: Manawatū Tararua Highway is suitable for tolling for the following reasons:

- Tolling was not considered during the Detailed Business Case or on approval of construction, or at any point during the project's development.
- Te Ahu a Turanga: Manawatū Tararua Highway is a replacement road for SH3 which is now 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.
- Saddle Road and Pahiatua Track are not feasible alternatives or safe. NZTA has acknowledged the alternatives are unsafe, notably in the Detailed Business Case, as well as in 2019 when a permanent speed limit of 60km/h 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 per 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.
- They are also not feasible or resilient alternatives due to the number of days a year they are closed.

TDC will not assume responsibility for Saddle Road, Pahiatua Track and Ballance Valley Road once the highway opens if it is tolled, due to the unaffordable maintenance costs, which they believe to be in the millions annually. If the alternative roads are returned to council, then the maintenance costs must be included in the tolling assessment as a cost.

TDC are grateful for the far-reaching support that has been forthcoming from councils around the North Island.

Palmerston North City Council (PNCC)

Do not support tolling this road

PNCC are disappointed with the lack of transparency during the consultation process, with the tolling assessment not being made available from the outset. PNCC oppose the proposal to toll for the following reasons:

- The proposed tolling is retrospective and not part of the original planning, indicating that it was considered an economically viable project without a toll.
- Te Ahu a Turanga is a replacement road for the closed State Highway 3 Manawatū Gorge Road and not a new road.
- 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.
- 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.
- The non-toll alternatives are not viable, being unreliable connections that face resilience issues and frequent closures.
- NZTA will look to return responsibility for maintaining the non-toll alternatives to PNCC and Tararua District Council, which will be incredibly challenging given the number of vehicles that will continue to use these roads.
- The non-toll alternatives were not designed for the level of forecast traffic, increasing the financial burden for maintain these roads on the local councils and ratepayers.
- Te Ahu a Turanga does not meet the criteria for tolling, with NZTA's assessment of 6,000-7,000 vehicle movements per day, well below the required 10,000 minimum. Even

accounting for growth, the diversion rate will see less than 10,000 vehicle movements per day.

Central Hawke's Bay District Council (CHBDC)

Do not support tolling this road

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 the opportunity for further discussions. While supporting tolling in principle, in this case CHBDC oppose the toll on the basis that:

- 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 in 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 healthcare hubs.
- Higher pricing in comparison to other toll roads.
- Increased maintenance expectations for Tararua District Council.
- The use of tolls was not included in the original business case for the road Support for the new road was received on the understanding it would remain free for users.
- Tolling the road will not unlock economic potential in the area.

Manawatū District Council (MDC)

Do not support tolling this road

MDC does not support the tolling proposed for Te Ahu a Turanga: Manawatū-Tararua Highway for the following reasons:

- A tolling proposal did not form part of the original business case, noting that the project must be assessed as economically viable prior to its implementation.
- Te Ahu a Turanga: Manawatū-Tararua Highway is a replacement road for the closed State Highway 3 Manawatū Gorge Road.
- The toll being proposed is almost double the current toll prices for northern motorways, with no explanation in the consultation material, also noting it is shorter by 3.5km than the Ōtaki to north of Levin highway.
- Shares 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 totalling over \$40.
- NZTA has stated the proposed toll will be used to finance NZTA nationally prioritised projects (RoNs) – none of which are in the Manawatū region.

If NZTA decides to toll, MDC requests:

- Toll pricing be set at no greater than \$2.20 for light vehicles and \$5.40 for heavy vehicles.

- NZTA publish its data and assumptions behind its estimate of 10,902 vehicles likely to travel the highway per day.
- Tolling does not commence until 2–5 years after the road becomes operational.

MDC is concerned about the condition of the Saddle Road and the proportion of people who will continue to use Saddle Road if tolls go ahead. MDC's preferred option is that the Saddle Road retain its State Highway designation in perpetuity, with ownership and maintenance remaining the responsibility of NZTA. However, if the Saddle Road is returned to local authority ownership and responsibility, NZTA commit to:

- 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.
- Suppling the necessary detour and approach signage to allow Saddle Road to be used as a detour in major crisis.

MDC supports in principle the tolling of future new State Highways, contingent on:

- Tolling forming part of the business case process.
- 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).

MDC also submits in support of Horowhenua District Council and the Tararua District Council submissions.

South Taranaki District Council (STDC)	Supports tolling
<ul style="list-style-type: none"> • Support the proposed road toll scheme for the Manawatū 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 phrase. • 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 request central government also explore other forms of funding for state highways such as Private-Public Partnerships (PPPs) and congestion/time of use charges. 	

South Wairarapa District Council	Do not support tolling this road
<p>Do not support tolling this road for the following reasons:</p> <ul style="list-style-type: none"> • This is a long-awaited direct replacement road for the Manawatū Gorge Road and should be free to use. • The safety risk to people avoiding toll and using Pahiatua Track or Saddle Road, both dangerous roads and not fit for purpose. • The combination of ongoing heavy use on fragile alternative roads combined with bad weather will incur considerable costs to councils and ratepayers to maintain the roads. • Maintenance that will be required on the Saddle Road is in the millions and is not worth spending on an already dangerous road. • The economic impact on Tararua residents, where the median income is \$26,300 and only 9.8% of the population earn over \$70,000. For those who commute, including tertiary students, the cost could be nearly \$2000 per year. • Question the supplied numbers, particularly with regards to the 10,000 minimum. • Announcing tolling at this late stage is a breach of NZTA's usual policy which states that tolling can only be considered in the detailed business case stage, prior to construction or on approval for construction. 	

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

Hawke's Bay Regional Transport Committee (RTC)	Do not support tolling this road
<p>The RTC recognises the overall benefits of tolling for new roads with an economic benefit, acknowledge the significant funding constraints of the NLTF and the need to explore alternative funding mechanisms, including tolling. When considering tolling:</p> <ul style="list-style-type: none"> • 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 and operations only. If tolls are retained at original levels once the initial investment recouped, the additional capital should be invested locally. • Costs must be controlled during construction as pushing rising costs on to users reduces their willingness to pay, ultimately undermining the purpose of tolling. • Tolls should only be applied to new infrastructure and not as a mechanism for funding the replacement of existing routes. • Tolls on a replacement road may drive traffic onto less suitable, lower-standard local roads, causing congestion, safety problems, 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 / Manawatū Tararua Highway: 	

- The RTC supports the efforts made by NZTA to date on the Manawatū Tararua Highway corridor and investments that secure reliable and resilient journeys into and out of the region, particularly as this corridor forms a key strategic link for Hawke's Bay.

The RTC opposes the toll for this road for the following reasons.

- Te Ahu a Turanga is a resilient replacement of a previous corridor. Tolling this route would contradict the information and advice contained within the GPS 2024.
- The 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.
- 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 (eg 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.
- The potential health implications for residents in the region who travel to Palmerston North for specialised healthcare.
- Ask NZTA to assess potential alternatives to tolling that may better serve the community and the region's long-term economic and social wellbeing.
- An additional concern was that tolling the Te Ahu a Turanga: Manawatū Tararua Highway sets a precedent that could impact the proposed four-laning of the Hawke's Bay expressway.

4.3 Land transport users and providers

NZ Automobile Association (AA)	Do not support tolling this road
<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: Manawatū Tararua Highway on the basis that the above principles have not been met.</p>	

Ia Ara Aotearoa Transporting New Zealand	Do not support tolling this road
<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 Manawatū Tararua Highway for the following reasons:
 - Manawatū Tararua Highway cannot be accurately characterised as a “new road”, for the purposes of tolling consideration.
 - The tolling assessment for the Manawatū 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.

NZ Heavy Haulage Association (HHA)	Do not support tolling
<ul style="list-style-type: none"> • Do not support tolling because Schedule 8 of the Land Transport Rule: Vehicle Dimensions and Mass (VDAM) does not allow the transport of goods that are anything but the smallest over dimension loads on roads that are tolled. • The HHA view is that over dimension loads will be able to travel more efficiently and far more safely on the Manawatū Tararua Highway compared to the Saddle Road or the Pahiatua Track compared to the alternative route and on this basis, are unable to support a toll on the Manawatū Tararua Highway project, without a change to the rule being undertaken. • Toll gantry points must be designed to allow the majority of over dimension loads to travel underneath them and suggest the envelope dimension of the gantries for the Tauranga Eastern Link be utilised if tolling is to be employed on this route. 	

National Road Carriers Association	Supports tolling this road
<p>Noted that the project provides a more resilient and productive link between Manawatu and Hawkes Bay, specifically mentioning the replacement is 4 lanes, making it a safer option. Tolling will address any cost blow out of the project, reducing the impact on the NLTF.</p>	

4.4 Infrastructure organisations

Infrastructure New Zealand	Supports tolling this road
<p>Infrastructure New Zealand suggest that tolling is a more equitable and transparent approach to capturing revenue to increase infrastructure spend.</p> <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 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. The increase in costs reflects the inflationary construction environment however this highlights the need to secure wider sources of revenue. Recognise 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. 	

4.5 Critical Healthcare organisations

s 9(2)(ba)(i) St John s 9(2)(ba)(i)	Do not support
<p>Oppose tolling of this road</p> <ul style="list-style-type: none"> s 9(2)(ba)(i) This new road is a replacement road for the closed Gorge Road. Rural communities are already disadvantaged by lack of government funding for basic services such as health care, tolling will additionally economically impact the rural community Believe tolling is not applied consistently in New Zealand, including other regional roads such as Waikato Expressway and Transmission Gully. Feel that the road is already funded and paid for. 	

5. Next steps

The tolling of new roads comes under Section 46 of the Land Transport Management Act 2003 and requires an Order in Council process to be completed before the road is opened. NZTA has a 3-step process to follow when assessing whether a road will be tolled or not. This public consultation and feedback report concludes the third and final step in this process.

Feedback provided through the consultation process will be taken into account by NZTA in the development of its tolling proposal for consideration by the Minister of Transport. A copy of this public feedback report will be provided to the Minister of Transport who will make a decision about recommending tolling for this road to Cabinet.

If a decision is made that SH3 Te Ahu a Turanga will be a toll road, an Order in Council must be in place before the road opens. SH3 Te Ahu a Turanga is due for completion in 2025.

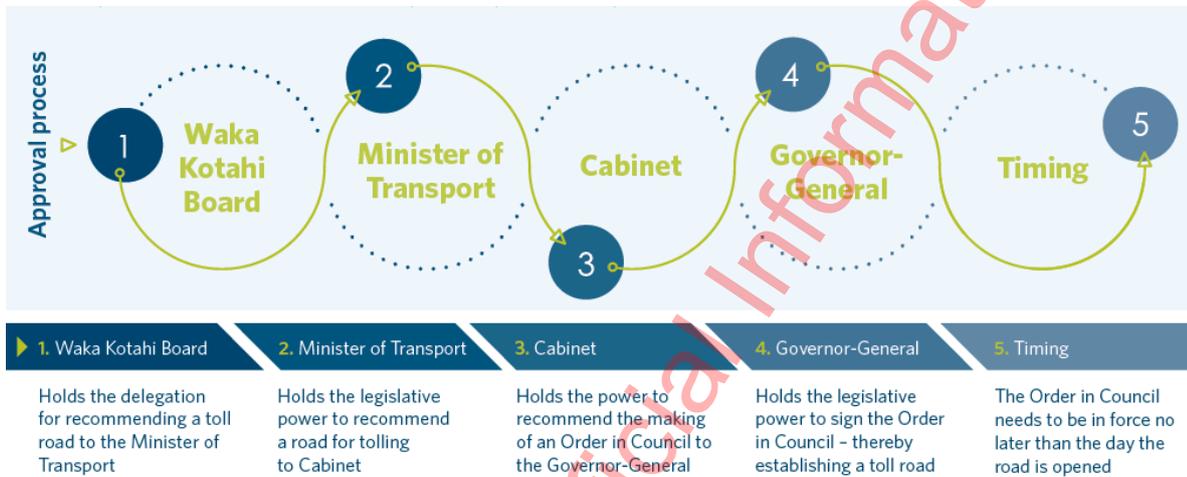


Figure 3 – The post consultation approval process for road tolling projects