

**Before Independent Commissioners
At Palmerston North**

Under the Resource Management Act 1991 (the Act)

In the matter of Proposed Plan Change G to the Operative District Plan
for Palmerston North

**Statement of evidence of Sarah Louise Downs for Waka Kotahi New
Zealand Transport Agency Limited - Corporate**

Dated 27 October 2023

Statement of evidence of Sarah Downs

1. Executive summary

- 1.1. My full name is Sarah Louise Downs. I am the Regional Manager System Design (Manawatu/Taranaki/East Coast) at Waka Kotahi NZ Transport Agency ("Waka Kotahi") and am presenting evidence on behalf of the organisation.
 - 1.2. My evidence outlines the statutory functions and obligations of Waka Kotahi and some of the aspects of the wider transport planning system, such as the Government Policy Statement for Transport.
 - 1.3. Waka Kotahi is responsible for contributing to an effective, efficient and safe land transport system in the public interest. This includes managing the state highway network and systems to manage funding for safety upgrades across the entire state highway network.
 - 1.4. Waka Kotahi has and will continue to express their support for enabling and guiding PNCC to deliver the required upgrades to support a well-functioning urban form that is consistent with local, regional and national aspirations. Waka Kotahi officers have met with PNCC and Horizons officers on a monthly or bi-monthly basis since 2021 to ensure PNITI is progressed and look forward to discussing how best to progress the transport infrastructure required for PPCG at the existing forums.
 - 1.5. Waka Kotahi submits that urban growth as enabled by PPCG is inconsistent with the collectively agreed upon PNITI programme unless progress is made by all parties to deliver the short and medium term PNITI programme in advance of growth at Aokautere, to ensure any negative effects from growth is mitigated.
 - 1.6. Waka Kotahi re-iterates our advice previously submitted to PNCC in a number of forums that progressing a business case to evaluate strategic fit, the range of responses available for the issues raised and the ability to fund and deliver would align with best-practice and enable Waka Kotahi to work collaboratively with PNCC to support future growth in the PPCG area.
 - 1.7. Should PNCC wish to proceed with PPCG in the short to medium term, Waka Kotahi would like to work with PNCC to better evaluate the impacts on the PNITI programme and in turn, future funding and both agency's collective abilities to deliver on the rest of the transport improvements needed around Palmerston North.
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2. Qualifications and experience

- 2.1. My full name is Sarah Louise Downs. I am the Regional Manager, System Design for the Central North Island (Manawatū -Wanganui, Taranaki, Hawke's Bay and Gisborne) region at Waka Kotahi NZ Transport Agency ('Waka Kotahi'), based in Wellington. I have been employed by Waka Kotahi in a variety of roles since November 2015. I am responsible for the planning, securing investment funding, design and delivery of transport system outcomes in the Central North Island region.
- 2.2. While I am not giving expert evidence, for completeness I have the following qualifications and experience:
- (a) Bachelor of Arts (Hons) Geography from London Metropolitan University,
 - (b) Postgraduate Diploma in Education from Manchester Metropolitan University, and
 - (c) Diplomas in Infrastructure Asset Management and Project Management.
- 2.3. I am giving evidence in my capacity as a Waka Kotahi employee, looking at the statutory role and function of Waka Kotahi. I rely on my experience and knowledge of working for Waka Kotahi for the last eight years. My evidence is informed by high level strategies and government policy relevant to Waka Kotahi, the Horizons Regional Land Transport Plan 2021-31, the collaborative work with our partners and ongoing investment in them through the Palmerston North Integrated Transport Initiative (PNITI), Accessing Central New Zealand (ACNZ) and the Te Utanganui Governance Group on various aspects of work on transport matters specific to this Plan Change as well as across the wider Palmerston North and the Manawatu-Whanganui region. This evidence takes account of Waka Kotahi objectives and statutory obligations and in particular our role in integrated land use and transport planning and funding across the region.
- 2.4. I am authorised to give evidence on behalf of Waka Kotahi.

3. Scope of evidence

- 3.1. My evidence addresses the following matters:
- (a) Statutory functions of Waka Kotahi
 - (b) Strategic Planning and Investment
 - (c) National and regional policy context

- (d) Planning for growth in the region and district and the effect of growth on Waka Kotahi operations and investment.
- (e) Consistency with PNITI
- (f) State Highway 57 Strategic Function
- (g) Timing for anticipated improvements to SH57 in the PPCG area.
- (h) Addressing transport related effects of growth in the Aokautere Structure Plan Area.
- (i) Reducing vehicle kilometres travelled (VKT)

3.2. In preparing my evidence, I have reviewed the notified Proposed Plan Change G (PPCG) material, including the following Section 42A report:

- (a) Section 42A report – Strategic Planning, prepared by Mr David Murphy

3.3. Where relevant I have relied on the evidence of

- (a) Mr Glenn Connelly, Waka Kotahi traffic and transportation evidence

4. Statutory functions of Waka Kotahi

4.1. Waka Kotahi is a crown entity established on 1 August 2008 under the Land Transport Management Act 2003 ('LTMA'). The statutory objective of Waka Kotahi under the LTMA is to "*undertake its functions in a way that contributes to an effective, efficient and safe land transport system in the public interest.*"¹

4.2. The objectives, functions and powers of Waka Kotahi are set out in the LTMA and the Government Rounding Powers Act 1989 ('GRPA'). Section 95(1) of the LTMA includes the following functions which are relevant to the applications:²

- (a) To contribute to an effective, efficient, and safe land transport system in the public interest; and
- (b) To manage the state highway system, including planning funding, design, supervision, construction, and maintenance and operations, in accordance with the LTMA and the GRPA.

4.3. The above functions reflect a general duty to ensure that all forms of land transport (not just state highways) operate in an effective and integrated manner. For this reason, Waka Kotahi is an approved requiring authority not only for the construction

¹ LTMA section 94

² LTMA sections 95(1)(a) and (g)

and operation (including the maintenance, improvement, enhancement, expansion, realignment and alteration) of state highways, but also cycleways and shared paths.³ It also means that Waka Kotahi also has an interest in how local roads (including walking and cycling networks and public transport facilities) are managed and funded.

5. Strategic Planning and Investment

5.1. Waka Kotahi's funding for transportation projects comes from:

- (a) the National Land Transport Fund ('NLTF');
- (b) local share, essentially local government contributions;
- (c) Crown funding outside the NLTF (Crown funding)
- (d) Supplementary funds where a third party may benefit from a land transport benefit, the third party is expected to contribute to that benefit.

5.2. As a Crown entity Waka Kotahi is required to follow a very structured approach to applying its funding in a responsible way that best meets the needs of New Zealand in accordance with the directions in the Government Policy Statement on Land Transport (GPS).⁴ The GPS is the mechanism by which the Minister of Transport guides Waka Kotahi (and the broader land transport sector) on the outcomes, objectives, and short to medium-term goals that the Government wishes to achieve through the National Land Transport Programme ('NLTP') and from the allocation of the NLTF.⁵

6. National policy context

Transport Outcomes Framework

6.1. The Ministry of Transport's Outcomes Framework (2020) identifies that the purpose of the transport system is to improve people's wellbeing, and the liveability of places. The Framework identifies five outcome areas to contribute to this purpose, these being:

- (a) inclusive access;
- (b) healthy and safe people;

³ Resource Management (Approval of Transit New Zealand as Requiring Authority) Notice 1994; Resource Management (Approval of NZ Transport Agency as a Requiring Authority) Notice 2015

⁴ LTMA, section 70

⁵ LTMA, section 80

- (c) economic prosperity;
- (d) resilience and
- (e) security and environmental sustainability.

Government Policy Statement on Land Transport

6.2. Waka Kotahi must give effect to the GPS. The GPS is required under the LTMA and outlines the Government's strategy to guide land transport investment over the next ten years.

6.3. The four strategic priorities of the GPS 2021 are:

- (a) Safety
- (b) Better travel options
- (c) Climate change, and
- (d) Improving freight connections

6.4. A key theme of the GPS is integrating land use, transport planning and delivery. There is also a focus on investment in “*providing people with better travel options to access places for earning, learning, and participating in society*”.

6.5. The Government has recently consulted on the draft Government Policy Statement on Land Transport 2024. The Draft GPS 2024/25 – 2033/34 also signals prioritisation for an integrated freight system as one of its six strategic priorities. The primary objective for an integrated freight system is for well-designed and operated transport corridors and hubs that provide efficient, resilient, multi-modal, and low carbon connections to support productive economic activity.

National Land Transport Programme and Fund

- 6.6. The NLTP is a three-year programme that sets out how Waka Kotahi NZ Transport Agency, working with its partners, plans to invest the National Land Transport Fund (NLTF) in accordance with the GPS to create a safer, more accessible, better connected and more resilient land transport system that keeps New Zealand moving.
- 6.7. The NLTP is informed by Regional Land Transport Plans (RLTPs) and by the Waka Kotahi investment proposal, which includes proposed state highway activities and nationally delivered programmes. All of the activity and project proposals are prioritised for funding on a national basis.

- 6.8. The key GPS themes influence the funding priorities for Waka Kotahi, **however the NLTF does not allow for the Transport Agency to resolve all transport deficiencies across the network.**
- 6.9. Waka Kotahi undertakes a prioritisation exercise every three years in collaboration with Road Controlling Authorities (RCAs) through Regional Transport Committees (RTCs)⁶, to identify, fund and deliver the infrastructure required for the highest priority proposals from across New Zealand. The outcome of this process is the National Land Transport Programme (NLTP) which sets the funding expectations.
- 6.10. The NLTP is informed by Regional Land Transport Plans (RLTPs) and by the Waka Kotahi investment proposal which includes proposed state highway activities and nationally delivered programmes. All of the activity and project proposals are prioritised for funding on a national basis.
- 6.11. **There is a limited pool of funding available to Waka Kotahi and competing priorities need to be balanced using investment prioritisation methods. Once the priorities are set in the NLTP and the RLTPs, it is difficult to obtain funding for additional projects that are not prioritised in those documents.**
- 6.12. Requests for funding from the NLTF must be supported by a fit-for-purpose investment proposal that uses the principles of the Business Case Approach. The Waka Kotahi Business Case Approach is a robust, principles and evidence-based approach for developing business cases for investment through the NLTP. It is based on the same five-case model as the New Zealand Treasury's Better Business Cases.
- 6.13. Waka Kotahi has no knowledge of a business case being progressed to date for PPCG, nor has Waka Kotahi received a completed Point-of-Entry document – which outlines the intent to undertake a business case – from PNCC to date.

7. Regional Context

Horizons Regional Land Transport Plan 2021-31

- 7.1. The Horizons Regional Land Transport Plan 2021-31 (RLTP) is a 10-year integrated planning document that sets out the strategic direction for land transport across the region. RTCs are required to develop an RLTP in consultation with their community and stakeholders every six years according to the Land Transport Management Act 2003.

⁶ Made up of elected members from the city and district councils in the region and representatives from government organisations such as Waka Kotahi, KiwiRail and NZ Police

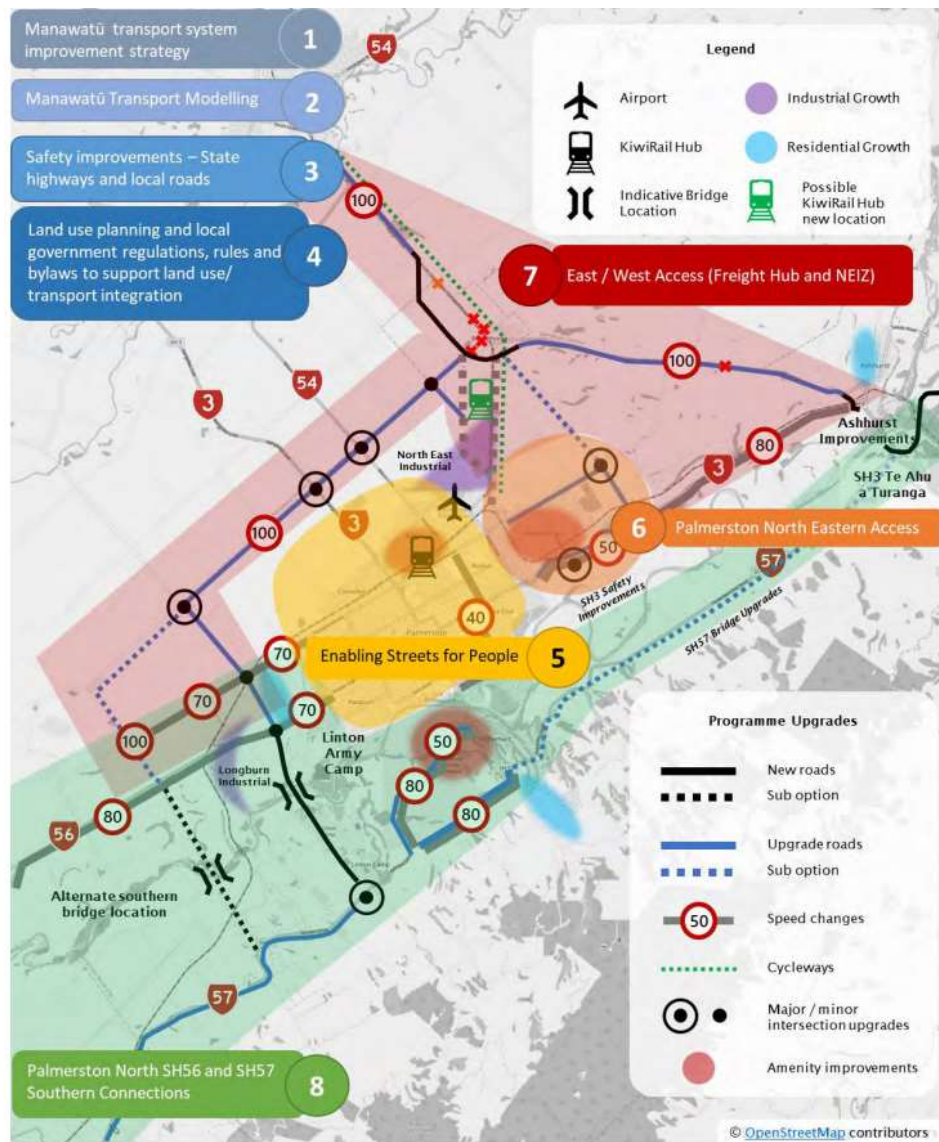
- 7.2. The RLTP is the primary document guiding integrated land-use planning, transport planning and investment across the Horizons Region. In addition to outlining the strategic direction for the region, the RLTP also outlines the activities proposed to deliver the strategic direction.
- 7.3. Waka Kotahi understands that currently there is no provision in the existing RLTP to support funding for the State Highway upgrades PNCC has identified in PPCG. Clarity is needed regarding whether any or all of the proposed upgrades are being put forward for inclusion in the next RLTP however that process is ongoing so the final.

Palmerston North City Council (PNCC) Transport Plan 2021-31

- 7.4. PNCC's LTP also outlines specific actions related to ongoing collaboration with Waka Kotahi to ensure a cohesive multi-agency response to achieve the above vision:
- (a) Support Waka Kotahi with the economic assessment and detailed business cases for the Palmerston North Integrated Transport Initiative
 - (b) Advocate for early delivery of the Palmerston North Integrated Transport Initiative

Palmerston North Integrated Transport Initiative (PNITI) Overview

- 7.5. PNITI is a package of interventions across Palmerston North to manage planned economic growth, support the freight and distribution potential of the region, address identified safety issues and improve the liveability of the residential areas and city centre.
- 7.6. The recommended programme is a set of improvements including corridor and intersection upgrades for safety and access, safer speeds, placemaking, public transport, and land use changes across the network.



- 7.7. PNITI effectively functions as a “Programme Business Case”, providing context and the single overarching strategy for integrated transport planning, land-use planning and overall transport investment across Palmerston North. It outlines what interventions are required to address universally agreed problem statements, as well as providing direction on when those interventions are required, where responsibilities sit and how funding can be unlocked.
- 7.8. Therefore, strategic fit with higher order documents such as PNITI is the key to unlocking NLTF investment for any interventions, both on the State Highway network and local roads.

7.9. The PNITI problem statements are:

- (c) Safety: Interspersed residential and industrial areas along with increasing travel demands and local network deficiencies results in real and perceived safety issues across the network.
- (d) Amenity: Interspersed residential and industrial areas, coupled with the sections of the identified freight network not being fit for purpose results in higher than expected heavy vehicle volumes on residential streets. This creates amenity and severance issues and reduces active travel participation.
- (e) Access: Growth and development is leading to increased travel demands for both freight and general traffic. Sections of the identified freight road network are not fit for purpose resulting in deteriorating access and conflicts to key destinations throughout the network.

7.10. The PNITI programme was developed by Waka Kotahi from 2018 to 2020 in conjunction with a number of partners including PNCC, Horizons Regional Council, KiwiRail & Manawatu District Council among others. It was endorsed by the Waka Kotahi Board in early 2021 and PNCC in late 2022.

7.11. PNITI is the highest priority project across the Horizons Region as stated in the RLTP. All Waka Kotahi's fully funded and co-funded activities need to be consistent with the outcomes of the RLTP and the projects – such as PNITI – included within it.

7.12. At the time of Waka Kotahi Board endorsement, the programme was estimated to cost \$335m-\$370m with a Benefit-Cost-Ratio of 1.3-1.6 including Wider Economic Benefits. This cost is excluding the capital investment required to build/upgrade the final ring-route as the detail required to determine adequate costings is subject to future Detailed Business Cases within PNITI.

7.13. PNITI includes initial actions, and short-term, medium-term and long-term programmes of works. The short-term programme is focused on addressing existing safety and access issues on the urban network. Initial actions are for partners to develop a clear roading hierarchy through good network planning and ensure data collection and modelling suites are fit-for-purpose to support ongoing best-practice transport, land-use and infrastructure planning.

7.14. Following on from the initial actions, PNITI's short-term programme has a strong focus on PNCC and Horizons Regional Council led actions such as addressing existing safety issues on Palmerston North's local road network, progressing with PNCC's Urban Cycle Network Masterplan, a programme of amenity, safety and

access interventions within the central city to prioritise people over vehicles and the implementation of a higher quality public transport service and supporting infrastructure.

- 7.15. The package also includes longer-term interventions to support the KiwiRail freight hub, such as corridor improvements between Ashhurst and Bunnythorpe, and a future downstream bridge over the Manawatu River to reduce trips through the urban network and enable placemaking and amenity improvements. These long-term interventions are dependent on progress made on the comprehensive programme of immediate, short and medium-term interventions.
- 7.16. Developing on the initial actions, having PNITI endorsed by the Waka Kotahi Board enabled PNCC to receive significant investment from the NLTF for the 2021-24 period to implement a number of safety and access interventions on the urban network as part of the short-term programme.

8. Consistency of PPCG with PNITI

- 8.1. Waka Kotahi's submission to PPCG raised a concern about the generation of growth contrary to PNITI. Specific references to urban growth in Palmerston North are made throughout PNITI by reference to PNCC's Integrated Plan – a high level spatial plan which outlines the key initiatives across the city's land-use planning to ensure that the wider city/district-wide transport planning interventions in the PNITI programme is responsive to and supports the city's growth and future land-use aspirations.

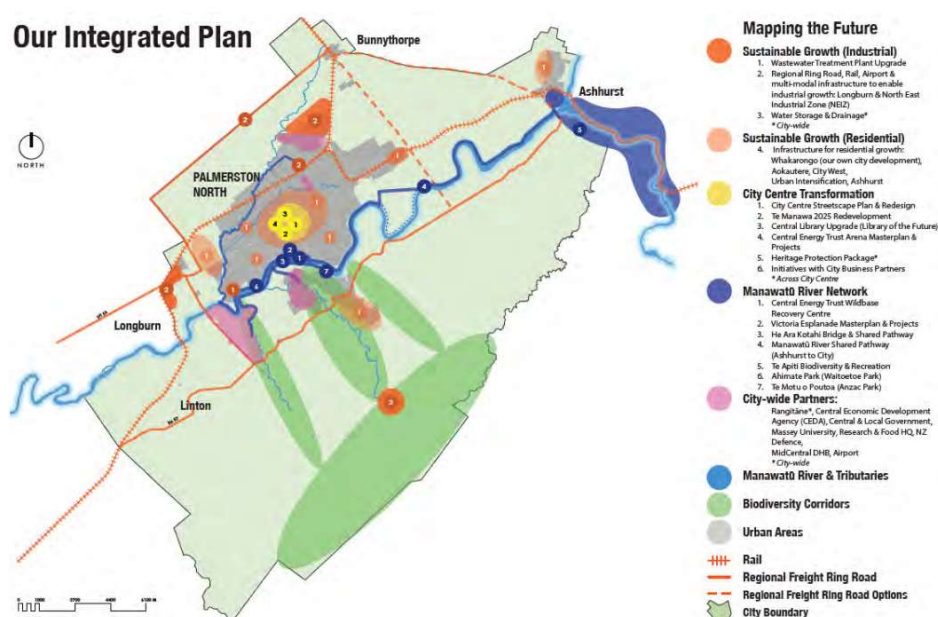


Figure 9-2: Our Integrated Plan (Source: Palmerston North City Council)

8.2. At the time of development, PNITI was designed in alignment with Palmerston North's land-use strategy and long-term vision for development and associated transport investment required to address Palmerston North's current and future transport network issues. PNITI's recommended programme features a 'Land-Use Planning' package outlining which plan changes PNCC would seek to deliver, and therefore informing the supporting programme of transport investment to ensure any future effects were appropriately addressed early:

- (a) Land-use opportunities for Tremaine Industrial Area
- (b) Kelvin Grove Residential Zone Change
- (c) Kakatangiata Plan Change
- (d) Ashhurst Plan Changes
- (e) North-East Industrial Zone Plan Change
- (f) Mātangi (formerly Flyers Line) Private Residential Plan Change
- (g) Napier Road Residential Plan Change
- (h) Actions to comply with National Policy Statement on Urban Development (NPS-UD)

8.3. The PNCC Integrated Plan noted some degree of residential growth in the Aokautere area in the short, medium and long-term programme maps and Waka Kotahi acknowledges that residential development in the Aokautere area has been signalled for some time by PNCC. However, during the development of the PNITI programme it was noted that significant residential capacity would be unlocked by the Kakatangiata Plan Change, which PNCC indicated was their top priority to rezone in the short to medium-term to address immediate and imminent demand.

8.4. PNCC's Housing and Business Development Capacity Assessment 2019 –noted that the Aokautere Growth Area would have *"the potential to supply over 1000 additional dwellings in the medium to long-term", with City West (now Kakatangiata) needing to be rezoned "earlier than previously anticipated"*. It is on this basis that the staging of transport investment within PNITI was formed, hence no short to medium term transport investment in SH57 was recommended.

8.5. PNITI states that *"SH57 (Aokautere Drive) severs the community in Aokautere. This is a national state highway that passes through an area with residential land use on either side"*⁷. However, PNITI does not discuss the level of residential development anticipated in Aokautere or identify any required upgrades to SH57 specifically to

enable such development as PNCC's priorities for rezoning land were the eight Plan Changes listed in 8.3.

- 8.6. The only Aokautere-specific reference is a recommendation for a safety assessment and/or improvements of SH57 in the long term⁷⁸ coinciding with further investigation and pre-implementation for the long-term optimal interventions for the SH57, SH56 and Tennent/Fitzherbert Dr routes in addition to other routes signalled as part of the future ring route. The scope and timing of these investigations are subject to and dependent on preceding PNITI packages – such as the Enabling Streets for People package and lead business cases for the future ring route – being well progressed and/or approaching completion, in addition to KiwiRail Freight Hub investment and implementation progressing.
- 8.7. Due to the long-term staging of transport investment within PNITI for the Aokautere area and SH57 corridor, the development of the PNITI programme focused heavily on the parts of Palmerston North around the KiwiRail Freight Hub and the corridors requiring investment to serve the wider North East Industrial Zone.
- 8.8. Waka Kotahi maintains its view that significant growth at Aokautere and therefore significant transport investment in the SH57 corridor to account for the additional demand occurring in advance of many elements of the short to medium-term PNITI programme is inconsistent with the growth strategy for Palmerston North collectively endorsed by Waka Kotahi, PNCC and Horizons Regional Council.
- 8.9. Waka Kotahi does recognise the requirement on councils to enable urban growth as directed by the NPS-UD and have requested PNCC develop a business case in collaboration with Waka Kotahi officers to determine a pathway forward for any SH57 upgrades required to support growth in the Aokautere Structure Plan Area that is consistent with the wider strategic direction under PNITI. The business case would serve to inform the ongoing PPCG process, however as noted at paragraph 6.13 above, no business case has been progressed to date, nor has a completed Point-of-Entry document from PNCC been progressed to date.
- 8.10. It is important to note that, even if the business case were completed, this does not guarantee funding. Waka Kotahi's entire programme of works – including those co-funded by councils – undergo regional and national prioritisation processes every three years for inclusion in RLTPs and the NLTP.

⁷ Palmerston North Integrated Transport Initiative (PNITI); Network Options Report, January 2021, Section 4.4.2 <https://www.pncc.govt.nz/files/assets/public/v/1/documents/have-your-say/closed/kiwirail-freight-hub/pncc-technical-evidence/key-docs-referred-to-in-the-technical-reports/pniti-1.pdf>

⁸⁷ In accordance with a key strategic objective of PNITI to improve "Safety and Access to Planning Developments such as Aokautere, Whakarongo and City West (now referred to as Kakatangiata)". PNITI Network Options Report, Section 4.4.2

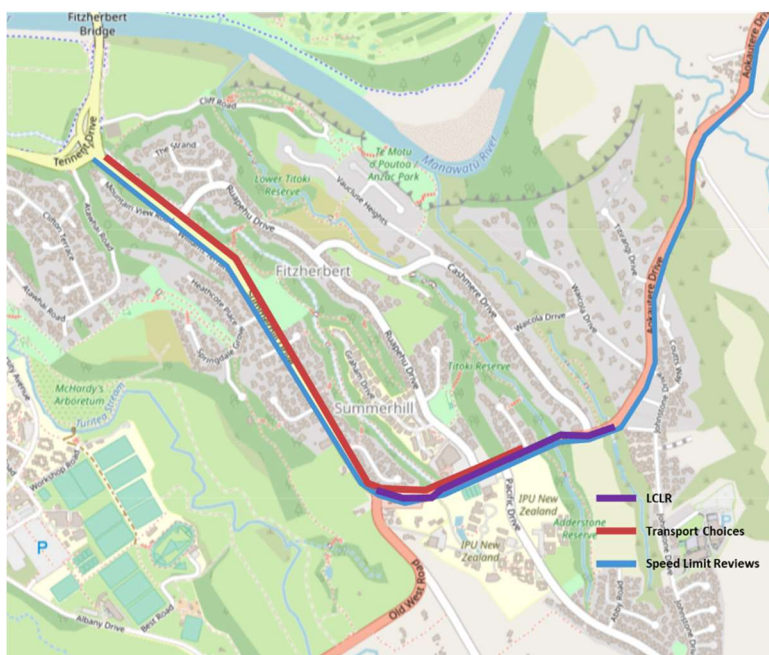
9. State Highway 57 Strategic Function

- 9.1. The section of SH57 adjacent to the PPCG area forms part of a nationally significant freight route between Wellington and key destinations in the Hawkes Bay, including primary industries and Napier Port. SH57 also connects traffic from the Hawkes Bay and wider Manawatu region to the National High Volume SH1 corridor from the south of Levin.
- 9.2. Around Palmerston North, SH57's function is supported by SH56 which acts as a secondary arterial corridor. However, the SH56 route has longstanding resilience issues related to flooding and geotechnical considerations. Therefore, SH57 remains a more strategically significant corridor.
- 9.3. The section of SH57 adjacent to PPCG also forms part of the national approved routes for High Productivity Motor Vehicles (HPMV). HPMVs are trucks that can operate above the current 44 tonne weight limit under permit, and HMPV routes are corridors that approved to accommodate loads over 44 tonnes under permit. A number of State Highways and many local roads nationwide are not approved to accommodate HMPVs, therefore retaining and protecting the few existing corridors that are HPMV approved is critical for supporting regional and national economic activity.
- 9.4. SH57 therefore serves significant local, regional and national functions for the safe, efficient and reliable movement of high volumes of people and goods while allowing Palmerston North's urban network to safely function for local needs without also having to cater to regional HPMV traffic.
- 9.5. Critically, SH57's regional significance will be at its highest after the opening of the Te Ahu a Turanga – Manawatu-Tararua highway (anticipated around 2025) but also before the implementation of the freight ring route around the Palmerston North urban area (as outlined in the long-term PNITI programme).
- 9.6. Ms Fraser correctly states in paragraph 3(h) of her evidence that there is likely to "*be a significant reduction in demand for travel along both Tennent and Summerhill Drive*" post construction of an additional Manawatu River Crossing as per the PNITI programme. A reduction in demand for travel along Summerhill Drive is also likely to correspond to a reduction in travel along SH57 due to both being part of the same linear corridor. However, during the interim period from 2025 until the implementation of the full PNITI programme, SH57 will be the most direct route for traffic travelling between Wellington and the Hawkes Bay regions, therefore Waka Kotahi will seek to ensure the route remains as safe, efficient and reliable for higher volumes of regional traffic to protect regional and national economic productivity.

10. Timing for anticipated improvements to SH57 in the PPCG Area

Current state

- 10.1. Waka Kotahi understands that a number of safety issues currently exist along the SH57 corridor adjacent to PPCG area, with PNCC's Safe System Audit raising safety risks associated with the current posted speed limits, the existing form of intersections and limited existing walking & cycling facilities. Mr Connelly's evidence addresses the outcome of the Safe Systems Audit in more detail.
- 10.2. Waka Kotahi is currently progressing with mitigation measures (in conjunction with PNCC) to address existing safety issues on SH57:
 - (a) Speed Limit Reviews
 - (b) Low-Cost-Low-Risk Safety Improvements to address severance on SH57
 - (c) Transport Choices Funding to enable PNCC to deliver active mode infrastructure.



Speed Limit Review

- 10.3. Waka Kotahi is progressing with a national State Highway Speed Management Plan 2024-27, as required by the Land Transport Rule: Setting of Speed Limits 2022, under which road controlling authorities must develop speed management plans with a whole-of-network approach. The "Safe and Appropriate Speed" (SAAS) for the

section of SH57 adjacent to the PPCG area is listed as 60km/h in Waka Kotahi's publicly available national register MegaMaps⁸.

- 10.4. The existing speed limit for this section of SH57 is 70km/h (Pahiatua Aokautere Road to Summerhill Dr/SH3 intersection), and this is intended to be reviewed as part of the Speed Management Plan 24-27 to address any existing safety and access issues on the corridor. This process will enable Waka Kotahi to take a technical review of the current and intended future function of the corridor – accounting for adjacent future growth – and set speed limits which are in keeping with the aspirations of both Waka Kotahi and PNCC.

Low-Cost-Low-Risk Safety Improvements

- 10.5. Waka Kotahi has earmarked funding in the State Highway Improvements Proposal (SHIP) 2024-27 under the Low-Cost-Low-Risk (LCLR) category for minor improvements (<\$2.0m capex) to address community severance caused by the SH57 corridor outside the Summerhill retail precinct. The scope of this activity will be determined with PNCC prior to delivery but will likely seek to address both pedestrian severance and safety risks at the current uncontrolled intersections on SH57.

Transport Choices

- 10.6. PNCC has also received funding from the Transport Choices Programme – enabled by the Climate Emergency Response Fund (CERF) – to expedite delivery of the core urban cycling network in Palmerston North. One of the two projects funded through this programme is implementation of improved cycling infrastructure along Summerhill Drive and SH57 adjacent to the PPCG area.
- 10.7. As stated by Mr Connelly⁹, Waka Kotahi considers that most of the existing traffic safety issues on SH57 adjacent to the PPCG area can be resolved via implementation of the above three initiatives.

Future state – SH57 at Aokautere

- 10.8. As noted by Ms Fraser¹¹, the demand on SH57 and the local road network from light vehicles, pedestrians and cyclists generated by growth as anticipated in PPCG is likely "to result in significant additional vehicle traffic". The growth enabled by PPCG would be the primary exacerbating factor for potential future safety, efficiency and capacity issues on SH57 – which will receive the downstream traffic demand from the local road network. Waka Kotahi therefore considers the responsibility for

⁸ MegaMaps is an online tool providing RCAs with speed management information and guidance for their network. The SAAS is based on several inputs including speed limit ranges for different street categories and the infrastructure risk rating.

⁹ Statement of Evidence of Glenn Connelly, dated 27 October 2023, paragraph 10.7.

¹¹ Statement of Evidence of Harriet Fraser, dated 15 September 2023, paragraph 1. (a) (i)

funding any required interventions on the SH57 corridor rests with PNCC and those benefiting from the development.

- 10.9. As indicated in Section 9 of my evidence, SH57 has significant local and regional functions which Waka Kotahi are seeking to maintain and protect for the economic and safety benefits for Palmerston North and the regions between Wellington and the Hawkes Bay.
- 10.10. Therefore, careful consideration must be used to determine the scope, nature and timing of any future interventions on SH57 to appropriately balance the range of existing and future needs and ensure the overarching aspirations of PNITI are achieved. Enabling growth at Aokautere through upgrades on SH57 that are contrary to the planned, considered and universally adopted manner in PNITI will have much wider and long-term implications on how improvements to the city's transport network are funded and delivered.
- 10.11. A corridor business case contributed to by both Waka Kotahi and PNCC would provide the clarity required to inform PPCG. As noted in 10.8 above, funding a business case would be the responsibility of PNCC as the lead agency for the Plan Change, as Waka Kotahi would be unlikely to be able to contribute given such a business case has not been noted in the PNITI programme, particularly at this early stage of the programme.
- 10.12. Furthermore, any future interventions on SH57 that require NLTF funding – either in part or in full – will be subject to regional and national prioritisation processes as outlined in paragraph 6.9. Funding for State Highway Improvements are therefore dependent on central government direction, regional council (RTC) prioritisation, strategic fit and the scale of need.

11. Addressing transport-related effects of growth in the Aokautere Structure Plan Area

- 11.1. As noted in paragraph 8.6 of this statement PNITI does not identify any short- or medium-term investment in the Aokautere Drive section of SH57.
- 11.2. Therefore, it is Waka Kotahi's view that progressing with significant transport investments along SH57 prior to, or without progressing on interventions elsewhere on Palmerston North's urban network, (which are already co-funded by Waka Kotahi under PNITI) may undermine the strategic investment plan set up by PNITI, including by being out of sync with the recommended programme.
- 11.3. Paragraph 55 of Mr Murphy's s42A states that "*transport improvements to the state highway network are the responsibility of Waka Kotahi*". I agree with this statement

to the extent that Waka Kotahi is responsible for the safe and efficient operation of its network. I disagree that Waka Kotahi is responsible for transport improvements that are required due to growth enabled by PPCG. Mr Connelly at paragraph 11.4 identifies that planned works by Waka Kotahi and PNCC can address the existing State Highway safety issues.

- 11.4. Mr Murphy is also correct that there is no funding readily available for the improvements identified by Ms Fraser. Notwithstanding this, Waka Kotahi is willing to progress with initial business-case efforts with PNCC to identify the scale of investment, programme outline and roles and responsibility for transport improvements on SH57, to support the growth enabled by PPCG. The initial step would be for PNCC to submit a Point-of-Entry (PoE) document to Waka Kotahi outlining the draft investment case, and this has been communicated to PNCC. As of 27 October 2023, Waka Kotahi has not received a PoE document.
- 11.5. Several meetings have been held between Waka Kotahi and PNCC planners, investment advisors and transport planners to discuss the processes and actions required to seek Waka Kotahi funding for the SH57 transport upgrades considered to be required. This included the need to achieve strategic fit with PNITI.

12. Reducing vehicle kilometres travelled (VKT)

- 12.1. Waka Kotahi has a crucial role to play in supporting the national shift towards a low-emission and climate resilient future, based on central government direction. With two-thirds of the country's transport emissions coming from the light vehicle fleet, reducing the reliance on fossil-fuelled vehicles is at the heart of the transport emissions challenge. The VKT reduction programme is focused on reducing the total distances travelled by our light vehicle fleet through:
- Improving Urban Form – Ensuring that land-use planning occurs in a way that prioritises local access, population health, makes use of existing infrastructure and is linked to transport planning.
 - Providing better travel options – Ensuring that safe, attractive and viable alternatives to private vehicle use are available for most people and most trips undertaken.
- 12.2. Waka Kotahi's original submission dated the 5th of September 2022 noted that we sought to have a "better integration of how active modes of transport will be provided for connecting the growth area with the city centre, schools and nearby amenities", as well as be provided "a more detailed analysis on how VKT and transport emissions reductions will be achieved" given greenfield development on existing urban fringes will likely generate higher volumes of vehicle traffic – as noted in Mr

Murphy's evidence point 73 – which is contrary to the national direction outlined in the Emissions Reduction Plan 2022 (ERP).

- 12.3. To date, PNCC have not provided detailed evidence to demonstrate the specific investment from either Waka Kotahi or PNCC required to ensure the outcomes of PPCG will align with local, regional and national targets for emissions reduction. With the expected levels of travel demand already being quantified by PNCC to inform the evidence for Plan Change G, Waka Kotahi seeks to understand how the expected demand will be split across all modes, according to PNCC's own mode-shift goals as well as those listed in the RLTP – listed in item 7.3.
- 12.4. This level of granular detail is critical to ensure appropriate infrastructure is planned and scoped well in advance of the travel demand occurring, as not doing so risks embedding less than optimal travel behaviour as development progresses and in turn, undermining local, regional and national goals for emissions reduction.

13. Conclusion

- 13.1. Waka Kotahi has and will continue to express their support for enabling and guiding PNCC to deliver the required upgrades to support a well-functioning urban form that is consistent with local, regional and national aspirations. Waka Kotahi officers have met with PNCC and Horizons officers on a monthly or bi-monthly basis since 2021 to ensure PNITI is progressed and look forward to discussing how best to progress the transport infrastructure required for PPCG at the existing forums.
- 13.2. Waka Kotahi submits that urban growth as enabled by PPCG is inconsistent with the collectively agreed upon PNITI programme unless progress is made by all parties to deliver the short and medium term PNITI programme in advance of growth at Aokautere, to ensure any negative effects from growth is mitigated.
- 13.3. Waka Kotahi re-iterates our advice previously submitted to PNCC in a number of forums that progressing a business case to evaluate strategic fit, the range of responses available for the issues raised and the ability to fund and deliver would align with best-practice and enable Waka Kotahi to work collaboratively with PNCC to support future growth in the PPCG area.
- 13.4. Should PNCC wish to proceed with PPCG in the short to medium term, Waka Kotahi would like to work with PNCC to better evaluate the impacts on the PNITI programme and in turn, future funding and both agency's collective abilities to deliver on the rest of the transport improvements needed around Palmerston North.